

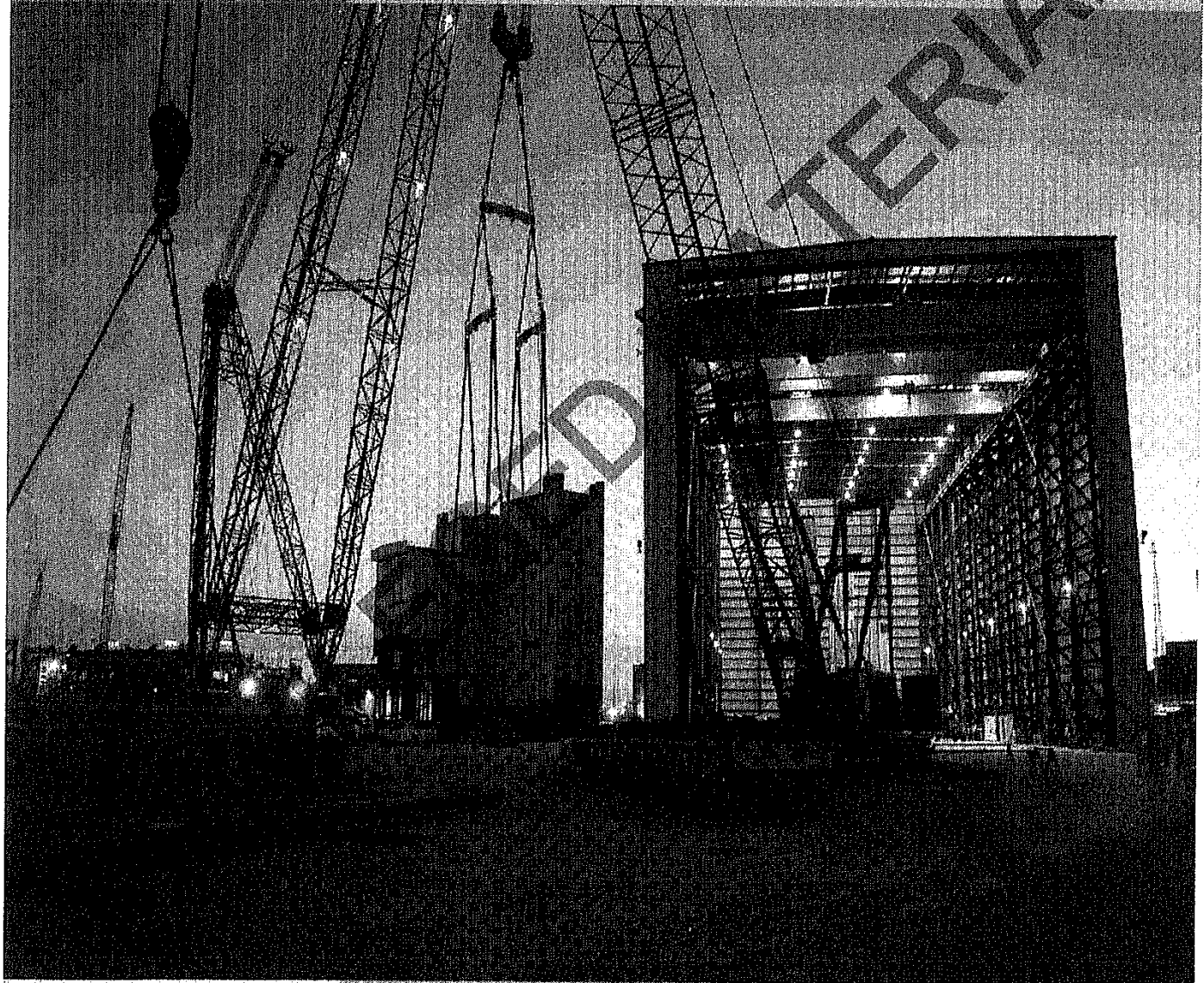


INFRASTRUCTURE
MINING & METALS
NUCLEAR, SECURITY & ENVIRONMENTAL
OIL, GAS & CHEMICALS

V.C. Summer Nuclear Generating Station Units 2 & 3

Project Assessment Report

DRAFT - November 12, 2015



Strictly Confidential to
Bechtel, SCE&G, and SCPSC

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V.C. Summer Nuclear Generating Station, Jacksonville, SC USA

Provided to Governor Henry McMaster
as directed by him and pursuant to S.C.
Const. Art. IV, Sec. 17 and S.C. § 1-3-10

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Abbreviations and Acronyms

BIP	Boundary Identification Package
BPO	Blanket Purchase Order
CB&I	Chicago Bridge & Iron
CFPC	Certified for Procurement and Construction
CGD	Commercial Grade Dedication
COD	Commercial Operation Date
COLA	Combined License Application
CTG	Component Test Group
DAC	Design Acceptance Criteria
DCD	Design Control Document
DCP	Design Change Proposal
DD	Design Deliverables
E&DCR	Engineering & Design Coordination Report
EDC	Engineering Design Completion
eFIN	engineering Finish It Now
EPC	Engineering, Procurement, and Construction
FSAR	Final Safety Analysis Report
I&C	Instrumentation & Controls
IFC	Issued for Construction
ITAAC	Inspections, Tests, Analyses, and Acceptance Criteria
ITP	Initial Test Program
JTWG	Joint Test Working Group
LAR	License Amendment Request
MAB	Module Assembly Building
N&D	Non-Conformance and Disposition Report
NRC	Nuclear Regulatory Commission
NSSS	Nuclear Steam Supply System
O&R	Observation & Recommendation
OCC	Operations Control Center
P&ID	Piping & Instrumentation Diagram
PMO	Project Management Organization
POD	Plan of the Day
PTG	Preoperational Test Group
RFID	Radio Frequency Identification
ROYG	Red-Orange-Yellow-Green
SCE&G	South Carolina Electric & Gas
SCH	Smith, Currie & Hancock LLP
SCPSA	South Carolina Public Service Authority
STG	Startup Test Group
UIN	Early Uncompleted ITAAC Notification
WBS	Work Breakdown Structure
WEC	Westinghouse Electric Company
WP	Work Package

Executive Summary

In accordance with a Professional Services Agreement signed on August 6, 2015 between Bechtel Power Corporation and Smith, Currie & Hancock LLP (SCH), Bechtel performed an assessment of the Virgil C. Summer Nuclear Generating Station (V.C. Summer) Units 2 & 3 project. The objective of the assessment was to assist SCH and the Owners (South Carolina Electric & Gas Company (SCE&G) and South Carolina Public Service Authority (SCPSA)) to better understand the current status and potential challenges of the project to help ensure the project is on the most cost efficient trajectory to completion.

Based on Bechtel's assessment, the current schedule is at risk. Significant issues affecting schedule include:

- The to-go scope quantities, installation rates, productivity, and staffing levels all point to project completion later than the current forecast. Bechtel's assessment, based on certain assumptions, is that the Unit 2 and Unit 3 commercial operation dates (CODs) will extend as follows:

Impacts on Commercial Operation Dates		
	Unit 2	Unit 3
Current COD	June 2019	June 2020
Adjustment	18 to 26 months	24 to 36 months
New COD	Dec 2020 to Aug 2021	June 2022 to June 2023

- While the Consortium's engineering, procurement, and construction (EPC) plans and schedules are integrated, the plans and schedules are not reflective of actual project circumstances.
- The Consortium lacks the project management integration needed for a successful project outcome.
- There is a lack of a shared vision, goals, and accountability between the Owners and the Consortium.
- The Contract does not appear to be serving the Owners or the Consortium particularly well.
- The detailed engineering design is not yet completed which will subsequently affect the performance of procurement and construction.
- The issued design is often not constructible resulting in a significant number of changes and causing delays.
- The oversight approach taken by the Owners does not allow for real-time, appropriate cost and schedule mitigation.

- The relationship between the Consortium partners (Westinghouse Electric Company (WEC) and Chicago Bridge & Iron (CB&I)) is strained, caused to a large extent by commercial issues.

Observations and recommendations are identified in the report for each functional area—project management, engineering, procurement, construction and project controls, and startup. Recommendations are identified as Priority “1” or “2” based on the degree to which implementation of the recommendation will help to ensure that the project is on the most cost efficient trajectory to completion. The overall top priority recommendations from Bechtel’s assessment are:

- Owners – Develop an Owners’ Project Management Organization and staff with EPC-experienced personnel.
- Owners and Consortium – Align Contract commercial conditions with the project goals and determine the realistic to-go forecast costs for project completion.
- Consortium – Create a new, more achievable, project schedule. Remove the mandatory constraints from the Integrated Project Schedule and allow the schedule to move based on the logic. Prioritize the development of mitigation/recovery plans based on their impact to the schedule. Ensure appropriate time is allocated for the installation of bulk commodities (large and small bore piping, pipe supports, cable tray, conduit, cabling).
- Consortium – Initiate a focused effort to complete WEC known engineering “debt” and release the over 1,000 drawing holds that exist.
- Consortium – Intensify the efforts of the Strategic Planning group, work package planning, constructability reviews, etc. to identify design changes needed well in advance of the construction need date. Stay on top of identifying and resolving emergent technical issues.
- Consortium – Increase manual staffing levels to allow working of all available work areas. Evaluate methods to have the craftsmen spend more time at the workface. Implement actions to improve craft productivity and retention. Simplify and streamline work packages.
- Consortium – Complete the inventory revalidation effort and establish a program to continually validate inventory. Complete the procurement schedule adherence effort to ensure equipment delivery dates meet construction need dates.

The recently announced stock purchase acquisition of CB&I’s nuclear business by WEC, the hiring of Fluor, and the settlement agreement with the Owners will resolve many of the Consortium-related commercial issues in the near term. It also provides a valuable safety net for the Owners if the project cost continues to rise. However, this new arrangement will not address the project challenges and EPC shortcomings that we have observed and documented, and will likely further delay mitigating the project impacts. The issues at V.C. Summer rest within

engineering, procurement, and construction, but our observation is that resolution of issues is driven by commercial considerations rather than EPC logic, often to the detriment of the Owners. | This is caused in part by the nature of the contract wherein engineering and NSSS equipment supply is on a fixed price and construction is cost-reimbursable. The driver is still in place (and possibly even more pronounced with construction now subordinated within the EPC team), for this suboptimal decision making dynamic to continue. It is our confident opinion that the cost will indeed continue to increase -- to and very likely beyond the level of the fixed price option. Based on our understanding of the project, and given the above described contract dynamic, the Owners need a much stronger EPC capable oversight function to ensure optimal EPC and cost-effective decision-making, and to ensure the best outcome for the project. Further, we believe it is in the best interest of the Owners for the oversight function to have the perspective of both owner and practitioner, and for it to be demonstrably robust. This will surface issues more quickly, facilitate optimal resolutions, and ensure success moving forward. It will also put the Owners in the best position for all potential project outcomes.

PRIVILEGED MATERIAL

1. Introduction

1.1 Assessment Scope

In accordance with the August 6, 2015 Professional Services Agreement, Bechtel's team evaluated the current status and forecasted completion plan through the design, supply chain, and construction aspects of the project. The focus of the assessment was on understanding the issues that have caused impacts to date, assessing the effectiveness of the mitigation plans put into place to address those issues, and reviewing the project management tools and work processes being employed to plan and execute the project, including change management, through completion and turnover of the units.

The following process was used to perform the assessment:

- Data validation
- Site walkdowns
- Leadership team interviews
- Functional breakout sessions
- Preparation of report

Areas reviewed during the assessment included project management, engineering and licensing, procurement, construction, startup, and project controls. An assessment of the project schedule was also performed. During the assessment period, the Bechtel team:

- Reviewed 353 Consortium and Owner documents
- Attended 70 meetings with Consortium and Owner personnel
- Conducted 35 interviews of Consortium and Owner personnel
- Completed 24 site walkdowns/real-time observations
- Attended 7 subject-specific presentations

1.2 Documents Reviewed

The assessment is based on the data, schedule, and other information provided to the team by the Consortium and the Owners during August, September, and October 2015. A listing of documents received and reviewed during the assessment is provided in Appendix A. Some data and information was provided electronically by the Owners and the Consortium. For the majority of data and information, a single hard copy was placed in a reading room at the site and no additional copies could be made. This limited the ability of the Bechtel team to fully assess the

information (e.g., engineering schedules, ROYG (red-orange-yellow-green) report, etc.). Further, many documents that contained sensitive information (e.g., contract terms, financial details, etc.) were redacted.

Materials received, collected, or prepared by Bechtel in connection with the assessment are the property of the Owners and were treated as confidential by Bechtel.

1.3 Assessment Team

The assessment was performed by the following Bechtel professionals:

Dick Miller	Manager of Operations, Assessment Project Lead
Carl Rau	Executive Sponsor
George Spindle	Construction Manager
Mike Robinson	Construction Manager
Ed Sherow	Engineering Manager
Ron Beck	Project Manager (Engineering and Construction)
Steve Routh	Project Manager (Engineering and Licensing)
Bob Exton	Procurement Manager
Jason Moore	Project Controls Manager
Jonathon Burstein	Project Controls Manager
Bob Pedigo	Startup Manager
Jerry Pettis	Project Administrator

Reviewers

Ty Troutman	Principal Vice President, Assessment Reviewer
John Atwell	Principal Vice President, Assessment Reviewer

The collective experience of these senior managers includes:

- Over 500 years of total experience
- Over 300 years of EPC nuclear experience
- Project management experience on over 85 EPC projects

Resumes of the Bechtel assessment team personnel are included in Appendix B.

1.4 Assessment Timeline

Key dates included:

July 1, 2015	Initial data request issued by Bechtel
August 6, 2015	Agreement signed

August 13, 2015	Kickoff meeting with the Owners and the Consortium
August 14, 2015	Initial documents received from the Consortium
August 19, 2015	Portions of Integrated Project Schedule received from the Consortium
September 8, 2015	Bechtel team mobilized to site
September 9, 2015	Consortium presentation to Bechtel team
September 8, 2015 to October 16, 2015	Bechtel team at site performing walkdowns, interviews, document reviews, etc.
October 22, 2015	Bechtel presentation to SCH, SCE&G, and Santee Cooper
November 6, 2015	Bechtel report issued to SCH

Copies of Bechtel's weekly reports to SCE&G and Santee Cooper are provided in Appendix C.

1.5 Observations and Recommendations

Observations and recommendations are identified in the report for each functional area—project management, engineering, procurement, construction and project controls, and startup. Recommendations are prioritized as follows:

- * Priority 1 – Implementation of this recommendation will significantly help to ensure the project is on the most cost efficient trajectory to completion.
- * Priority 2 – Implementation of this recommendation will help to ensure the project is on the most cost efficient trajectory to completion.
- * Other – Other recommendations identified by the assessment team.

in full
Not
part

PRIVILEGED MATERIAL

2. Project Management

This section describes the assessment of the project management aspects of the project. Section 2.1 provides a summary of the assessment. Section 2.2 provides project management observations and recommendations.

2.1 Summary

The execution of any large scale EPC project is a cross-functional task covering the entire range of these services plus more as covered in the contractual agreement(s). To ensure that that the range of services is fully integrated such that the project can be executed as efficiently as practical, it is incumbent upon the project management staff to plan, organize, direct, and control all facets of the project. As the Owners, SCE&G and Santee Cooper have the responsibilities to manage their portion of the prime contract and ensure that the Consortium contractors are fulfilling their contractual obligations.

In performing the project management assessment, Bechtel approached this project management function in two ways. Bechtel assessed how the Owners were managing their contractual responsibilities and secondly how the Consortium partners were managing their contractual obligations. Contractual documents were provided to Bechtel for the assessment; however, the contractual documents were redacted to a large extent. Bechtel was not provided any commercial terms associated with the prime contract agreement between the Owners and the Consortium. As a consequence and as regards any commercial terms between the Owner and the Consortium or between the Consortium partners, Bechtel was left to rely on information provided during management interviews, presentations, and attendance at daily, weekly, and monthly meetings.

2.2 Observations and Recommendations

Project management observations and recommendations are identified in Table 2-1.

Table 2-1. Project Management Observations and Recommendations	
No.	Description
PM1	<p><u>Observation(s)</u></p> <ul style="list-style-type: none"> The Consortium's project management approach does not provide appropriate visibility nor does it provide accuracy on project progress and performance. There is a lack of accountability in various Owner and Consortium departments. The Consortium's lack of project management integration (e.g., resolution of EPC issues) is a significant reason for the current construction installation challenges and project schedule delays. The approach taken by the Owners does not allow for real-time, appropriate cost and schedule mitigation.

Table 2-1. Project Management Observations and Recommendations

No.	Description
	<u>Recommendation(s)</u> <ul style="list-style-type: none"> • (Priority 1) Develop an Owners' Project Management Organization (PMO) and staff with EPC-experienced personnel dedicated to the project that are empowered with the roles, responsibilities, and accountabilities for making the needed project-related decisions to keep the project on track. • (Priority 2) Assign recognized high-performing personnel to the current management personnel in WEC and CB&I (i.e., shadow positions) as part of a major improvement plan.
PM2	<u>Observation(s)</u> The WEC-CB&I relationship is strained, caused to a large extent by commercial issues (see last bullet of Executive Summary). <u>Recommendation(s)</u> <ul style="list-style-type: none"> • (Other) The Owners should take an active role in determining the reason(s) for the relationship and develop an action plan, including possible new contract terms, to fix the relationship.
PM3	<u>Observation(s)</u> The overall morale on the project is low. <u>Recommendation(s)</u> <ul style="list-style-type: none"> • (Priority 1) The Project needs to experience some successes, no matter how small. Publish and post scheduled activities for the coming months around the job site. Post activities that have a high likelihood of being completed within schedule. Reward those responsible for achieving success (i.e., make success contagious). • (Priority 2) Recognize individuals for their contributions to the project. For example, have an employee of the month from the various functions/various craft trades and publicly reward them. Rewards could include preferred parking for a month, gift certificates, etc.
PM4	<u>Observation(s)</u> <ul style="list-style-type: none"> • It appears that the Contract has created an imbalance between the Owners and the Consortium. The Consortium does not appear to be commercially motivated to meet Owner goals. • Engineering has not been completely responsive to Procurement and Construction requests for clarification and changes (e.g., timeliness, constructible designs); this is believed to be caused mostly by the commercial situation. • The Consortium's commercial structure, while not shared, is outwardly affecting the day-to-day working relationships between the Consortium partners and is creating performance issues, including significant non-manual turnover. <u>Recommendation(s)</u> <ul style="list-style-type: none"> • (Priority 1) Align commercial conditions with the project goals. • (Priority 2) Facilitate Owner and Consortium teambuilding. If necessary, replace personnel with others that share the goals developed by the project. • (Priority 1) Determine the realistic to-go forecast costs for the project completion, make adjustments/changes where necessary.

Priorities
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report
Draft

3. Engineering and Licensing

This section describes the assessment of the engineering and licensing aspects of the project. Section 3.1 provides a summary of the engineering status. Section 3.2 addresses current licensing status. Section 3.3 provides engineering and licensing observations and recommendations.

3.1 Engineering Current Status

There are approximately 15 to 18 months of sustained detailed design engineering to be completed by the Consortium for the AP1000 standard plant and the V.C. Summer site specific design. The majority of this engineering is scheduled to be completed by December 2016 based on the information contained in the WEC and CB&I to-go engineering completion schedules. Some of this design work is near term critical path to support procurement and construction (primarily civil and module work), while the balance is design work which must be completed to support fuel load.

Other significant engineering workloads include completing design engineering work needed for fuel load and startup, resolution of Engineering & Design Coordination Reports (E&DCRs), resolution of Non-Conformance and Disposition Reports (N&Ds), and vendor document reviews.

3.1.1 WEC Engineering

In general, WEC is responsible for performing detailed design engineering for the nuclear island (containment and auxiliary building) structures; the plant safety systems; ASME Class 1, 2 and 3 piping systems; and nuclear island structural, equipment, and piping modules. Turbine instrumentation and controls (I&C) are being designed by Toshiba for WEC. WEC also specifies and procures all standard plant valves.

WEC states that they completed their detailed design engineering for the U.S. AP1000 standard plant (V.C. Summer and Vogtle) in April 2015. Engineering complete is defined as Certified for Procurement and Construction (CFPC) or Issued for Construction (IFC). WEC has identified that approximately 4% of the design engineering has not yet been completed. This remaining engineering is referred to as "Engineering Debt" and it includes both the engineering that must be completed to support procurement and plant construction as well as the substantial other engineering activities needed for fuel load and startup. I&C design is also not completed and is not included in the to-go "debt" work scope. Design Deliverables (DDs) consist of construction and procurement drawings, documentation, and other "debt" reconciliation. Approximately 1,400 DDs remain to be completed. During the September 9, 2015 Consortium presentation, WEC stated that they were 94.3% design complete.

WEC's major to-go design priorities to support construction are:

- Electrical tray, conduit, and supports design above El. 100' in the auxiliary building.

- Civil design above El. 100' in the auxiliary building; C7 reinforcing steel El. 135' – El. 162' in the auxiliary building.
- A5/A6 floors in the auxiliary building.
- SPL18 and SPL51 floor modules design modifications based on China installation experience; this is about 20% review complete and the modified design is urgently needed by construction to support module fabrication and installation.

WEC detailed design engineering is being performed at its home office in Cranberry, PA, offices in Spain, and to a limited extent at the V.C. Summer and Vogtle sites and in other WEC offices. WEC has approximately 520 engineering personnel assigned to the AP1000 design engineering efforts, but only about 40 are located at the V.C. Summer site. Within the Cranberry engineering staff, WEC has established three "response teams" consisting of approximately 80 engineers dedicated to addressing emergent issues requiring engineering disposition or resolution. These teams are civil-electrical, modules, and mechanical. WEC is also planning to put in place a review board for electrical and piping to anticipate potential design changes and construction challenges and resolve these well in advance of the construction need date.

3.1.2 CB&I Engineering

In general, CB&I is responsible for performing detailed design engineering for the balance of plant including the turbine island, annex building, radwaste building, diesel generator building, service building, administration building, and site specific structures and systems. CB&I is also responsible for the design of approximately 45 systems, including ASME B31.1 piping systems and all cable routing and scheduling. CB&I is the design authority for the AP1000 standard plant balance of plant and site specific design work.

CB&I has not yet declared "Engineering Complete." The integrated project schedules showed August 31, 2015 as the "Engineering Complete" date. During the September 9, 2015 Consortium presentation, CB&I stated that they were 82.5% design complete.

CB&I's to-go standard plant ("1 x 4") and V.C. Summer site specific work is contained in its P6 to-go engineering schedule. A review of this schedule shows it to be comprehensive and it identifies interfaces with procurement, vendors, construction, and WEC engineering. CB&I's major to-go design priorities to support construction are:

- Chilled water system redesign, scheduled to be issued by December 2015
- Turbine drain and vent system redesign, scheduled to be issued by December 2015
- Annex building reinforcing steel design, being resolved by CB&I's Vogtle design team, common for V.C. Summer

- Main steam piping overdesign (main steam pipe wall thickness over-specified by WEC) – creating revised support designs and problems with the design of the main steam pipe anchor at the auxiliary building wall (stargate)
- ASME N-5 data reports, which are planned to be inserted into the construction schedule by the end of September 2015.

CB&I's detailed design engineering is being performed primarily onsite at V.C. Summer with support from the Vogtle site and CB&I's home office locations. CB&I has approximately 270 engineering personnel assigned to the AP1000 and site specific scope, of which 184 are located at V.C. Summer, 27 at Vogtle, and the remaining personnel in CB&I's Charlotte, NC, or Canton, MA, offices.

3.1.3 SCE&G Engineering

SCE&G provides engineering oversight of WEC and CB&I. This oversight includes the following generic items:

- Monthly schedule review and progress meetings
- E&DCR review (on a sampling basis)
- Review of major equipment N&Ds for "accept as is" or "repair"
- Review and input to departure evaluations and license amendment requests (LARs)
- ITAAC coordination and closure
- Review and approval of "upper tier" design documents, such as P&IDs and single lines.

As part of its efforts, SCE&G maintains close coordination with its Southern Company counterparts for Vogtle Units 3 & 4.

SCE&G engineering consists of 17 persons—the manager, 2 supervisors, and 14 engineers.

3.1.4 Control of Engineering Activities

WEC and CB&I hold a weekly engineering schedule update and interface meeting to status engineering progress. The ROYG report is reviewed and it identifies engineering activities that are impacting construction. A gap file report is also prepared to identify engineering and construction activity interface ties. SCE&G also holds monthly engineering completion status meetings with WEC and CB&I.

The design change control process being used by both WEC and CB&I consists of design change proposals (DCPs) and E&DCRs. Both are managed through a "stage gate" process. DCPs are

noted as "Class 1" and "Class 2" as are E&DCRs. Class 3 E&DCRs are not part of the stage gate process for design change control.

Both WEC and CB&I employ an engineering Finish It Now (eFIN) process in support of Construction. Emergent work is taking priority to DD completion within both the WEC and CB&I design organizations. WEC indicated that it expects changes (rework) to a few ASME pipe spools that have already been delivered to the site. Most of the changes (rework) are expected in ASME pipe supports resulting from changes in pipe support locations. Discussions with CB&I electrical field engineers and superintendents indicate that there may be similar rework issues with WEC electrical cable tray support designs due to design complexity.

3.1.5 Post-Detailed Design Engineering Closure Plan

Beyond completing the detailed design needed for construction, there remains a significant amount of engineering that must be performed to support fuel load and startup. This primarily involves the design engineering work performed by WEC, and to a lesser degree the work performed by CB&I. These activities and programs must be completed to support preoperational testing, startup, and system turnover for fuel load and power ascension testing and include:

- Final nuclear steam supply system (NSSS) safety analyses for as-built conditions, including small break and large break loss-of-coolant accident analyses
- ASME pipe stress and pipe support as-built reconciliation
- Structural adequacy evaluation for Category I structures
- Containment structural integrity and containment integrated leak rate test programs (including engineering acceptance criteria)
- Hot functional and vibration monitoring test program (including engineering acceptance criteria)
- Class 1 stress reports (components and piping)
- Engineering support to component testing and pre-operational testing and startup
- Engineering document/record turnover to the Owner

This work needs to be fully scoped, resource-loaded, and scheduled in the P6 integrated project schedule with appropriate ties to construction and startup program activities. Based on a review of the current schedule, the Consortium has not started this planning effort.

3.1.6 Design Change Control and Emergent Design Engineering Work Scope

Because of design complexity, particularly reinforcing bar design and spacing tolerance requirements, structural module fabrication in offsite and onsite fabrication shops is requiring a

significant amount of E&DCRs to be reviewed and dispositioned by engineering to modify issued designs to be more constructible. This trend will continue as construction moves to the installation of piping, cable tray, conduit, HVAC, and equipment/components, especially with the supports for these items owing to the complexity of design that has been identified in advance by construction personnel.

The number of issues identified during the current civil phase of the construction effort is significant. These issues have been identified during the erection of the nuclear island and turbine island structures which comprise reinforced concrete basemats, exterior and interior walls, as well as the auxiliary building and several major steel composite structural modules in the containment. Current data shows that from May to September 2015 there is a trend of more E&DCRs being initiated (requests made) than are being closed (approved/dispositioned). This data shows that current E&DCR backlog work is not being worked off and indicates that a continued focus and possible increase in staffing is required:

Responsible Company	Average Initiated	Average Closed	Open at End of September 2015
WEC	~85	~71	~78
CB&I	161	149	60

The incorporation of E&DCRs into the parent document is tracked and status data is provided in typical engineering design completion (EDC) dashboards (as seen in the Tuesday site POD meeting data). The data in the September 15, 2015 POD showed E&DCR incorporation is behind (shown with status "red" for 3 of 4 categories).

E&DCR response support has the potential to pull resources from other ongoing design completion efforts and negatively impact emergent construction needs if timely responses are not provided. The incorporation of approved E&DCRs into the parent document will be a resource demand, but failing to timely incorporate E&DCRs into parent documents will violate procedures and provide a potential error trap of multiple changes against work being planned and implemented.

3.1.7 Non-Conformance and Disposition Reports

N&Ds require design engineering support for disposition approvals and assessment of impacts to issued design for dispositions of "repair" and "use as is". This disposition concurrence is an emergent activity that is usually a high priority to support construction.

N&Ds are tracked and summaries are provided in various reports. The Thursday POD report has both WEC and CB&I open N&D reports by age. The September 24, 2015 POD showed 183 N&Ds open for WEC action and 477 N&Ds open for CB&I action. The October 1, 2015 POD showed 183 N&Ds for WEC action and 328 N&Ds open for CB&I action. (Note: The CB&I action includes both design and field engineering actions as the data split between groups was not readily available.)

N&D response support has the potential to pull resources from other ongoing design completion efforts to support the emergent construction needs.

3.1.8 Vendor Document Review and Approval

It was identified that WEC has approximately 35,000 remaining vendor documents to review and approve and that CB&I has approximately 100,000 vendor documents yet to approve. Procurement engineering has the responsibility for reviewing and approving these documents.

3.1.9 Technical Engineering Issues

Two significant issues that the Consortium engineering groups are working on include tube steel wall thickness and equipment preservation:

- **Tube Steel Wall Thickness (Hollow Structural Shapes).** The site has identified that there is an industry-wide issue with the fabrication of cold-formed welded and seamless tube steel structural shapes. The manufacturing process for A500 structural tube shapes creates wall thicknesses less than that required by the ASTM material specification. WEC and CB&I are working together to address a plan that will allow the use of this material at both Vogtle and V.C. Summer.
- **Equipment Preservation.** Early site delivery of equipment and components, coupled with ongoing construction schedule delays, is creating several problems. The original equipment specifications specified preventative maintenance or on-site storage requirements typical for "normal" time between site delivery and installation in the plant. Engineering is now updating equipment specifications so that purchasing/procurement can contact suppliers to request them to provide updated preventative maintenance or storage requirements necessary for a longer storage period between site delivery and plant installation/equipment operation. It is unknown whether any equipment has degraded to the point where it must be replaced, and it is unknown whether equipment and component warranties are impacted.

Further, the Consortium has compiled a listing of major risks to project completion extracted from the project risk register. From an engineering perspective, the major risks include:

- Reactor coolant pump issues
- Coupler weld issues
- Passive core cooling system issues
- Auxiliary building wall 11 changes
- Reactor coolant system/steam generator system transient analysis
- Generic Safety Issue 191 cable debris issue

- Motor and air operated valve operational setup sheets

The Consortium should endeavor to address and resolve these risks to minimize project impacts.

3.2 Licensing Current Status

The V.C. Summer licensing effort appears to be well organized and staffed by personnel with extensive experience with the AP1000 Design Control Document (DCD), the V.C. Summer (and Vogtle) Combined License Applications (COLAs), and interactions with the NRC.

3.2.1 Licensing Staffing

SCE&G manages the overall licensing program for V.C. Summer and they work closely with the licensing and engineering personnel from Southern Company for the Vogtle project. WEC manages the Consortium's licensing efforts.

There are 14 personnel in the SCE&G licensing group. 5 persons handle LARs and departures. The rest of the group handles NRC inspections, other permits, Final Safety Analysis Report (FSAR) update, the 10 CFR 52 change process, and operating programs.

The WEC licensing organization currently has 9 personnel at the site. Four of these personnel are working on licensing issues and 5 are dedicated to the closure of Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC). The number of ITAAC personnel is expected to increase to 10.

In the Cranberry offices, WEC has one director, 3 supervisors, and 22 engineers working on LARs, departures, and regulatory issues.

CB&I has 2 licensing personnel assigned at the site and 1 manager in Charlotte.

3.2.2 License Amendment Requests and Departures

Currently there are 120 LARs and 657 departures. The breakdown of LARs is as follows:

35	WEC LARs approved by the NRC
2	SCE&G LARs approved by the NRC
18	LARs submitted to the NRC, but not yet approved
63	Not yet submitted to the NRC
2	Vogtle only
120	Total

Known LARs appear to be well in hand with detailed schedules developed for each LAR. There are active and continuous interactions with the NRC on each LAR and the NRC is working to meet

construction need dates. The schedules for LAR 30 and 111 were reviewed and they include a good breakdown of schedule activities and durations for these LARs.

The Consortium is tracking their schedule and quality metrics for licensing change packages and improvements have been seen in both areas.

SCE&G Licensing is working to improve the turnaround time for incorporating LARs and departures into the integrated FSAR. At the time of the assessment, 1 approved LAR and 108 approved departures had not been incorporated. Formal revisions to the FSAR are issued every 6 months.

Various LARs have represented significant project challenges since the start of safety-related construction including:

LARs 54, 55	Basemat ACI-349 shear reinforcement (February 2013)
LAR 60	Auxiliary building structural floors (July 2014)
LAR 72	CA01 module anchor and CA05 (March 2015)
LAR 78	CA04 tolerance change (August 2015)
LARs 110, 111	AWS D1.1-2000 (September 2015 and TBD)
LAR 30	Remove MSIV compartment vents and change penetration rebar design/turbine bay wall 11.2 tornado missiles (TBD)

The Consortium identifies the possibility of emergent LARs as one of the project's significant risks. These are LARs (like the recent LAR on CA22 rebar) that are discovered late and have the potential for impacting construction work progress. The various tight tolerances identified in DCD Tier 1, Table 3.3-1, "Definition of Wall Thicknesses for Nuclear Island Buildings, Turbine Building, and Annex Building" are a continuing concern with the civil construction work underway. And, as the number of construction work fronts expands, the potential for identifying emergent LARs (and departures) may increase.

3.2.3 ITAAC

There are 873 ITAAC that must be closed for each unit. Thirteen (13) of the ITAAC have been closed (about 1.5%).

An ITAAC schedule has been developed that includes the closure activities for each ITAAC. The schedule is a good tool to track the efforts for ITAAC closure. Periodic ITAAC schedule reports are also submitted to the NRC.

All ITAACs must be closed by fuel load. This will be a significant challenge requiring substantial efforts by the engineering and licensing organizations in the late stages of the construction effort.

The current schedule shows a peak of almost 120 ITAAC closures in January 2018 and over 90 in June 2018.

ITAAC performance and documentation plans have been prepared for each ITAAC. Several examples were reviewed during the assessment:

- APP-RNS-ITH-004, Standard Plant ITAAC 2.3 06.09b.iv
- APP-PCS-ITH-014, Standard Plant ITAAC 2.2 02.02a
- APP-RCS-ITH-048, Standard Plant ITAAC 2.1 02.11b.iii
- APP-RCS-ITH-056, Standard Plant ITAAC 2.1 02.08b
- APP-RCS-ITH-060, Standard Plant ITAAC 2.1 02.08d.vii

These plans appear to be complete and identify the responsible organizations, ITAAC wording, supporting documents, and the ITAAC performance and documentation plan. The plans include the logic for ITAAC performance, deliverables to support ITAAC submittal, personnel identification/ assignment, materials or instrumentation procurement needed, vendor support needed, and the schedule for performance (including schedule activities in the integrated project schedule). A draft of the ITAAC closure letter is also included in the plan.

SCE&G and Southern Company have recently met with the NRC to discuss the concept of Early Uncompleted ITAAC Notification (UIN). The UIN concept of getting early NRC agreement on planned actions for later verification when completed could help with the high number of ITAAC closures at the end of the construction effort.

Public involvement or intervention in the ITAAC closure process is considered a project risk, although the potential for intervention is viewed as limited based on the specific 10 CFR 52.103 criteria.

The Consortium has identified delivered equipment conformance to ITAAC requirements as one of the project's significant risks.

3.3 Observations and Recommendations

Engineering observations and recommendations are identified in Table 3-1.

Table 3-1. Engineering Observations and Recommendations	
No.	Description
E1	<p><u>Observation(s)</u></p> <ul style="list-style-type: none"> • Numerous E&DCRs are being created, processed, and implemented due to incomplete design or to resolve constructability issues. • Based on the team's observations of current civil work, the issued design is often not con-

Table 3-1. Engineering Observations and Recommendations	
No.	Description
	<p>structible (currently averaging over 600 changes per month). The complexity of the engineering design has resulted in a significant number of changes to make the design constructible.</p> <ul style="list-style-type: none"> The forecast and scheduled/work-off plan is unclear with respect to E&DCRs. <p><u>Recommendation(s)</u></p> <ul style="list-style-type: none"> (Priority 1) Initiate a focused effort to complete known design "debt" to assist construction planning and to eliminate one source of E&DCRs. (Priority 1) Establish a forecast based on historical data and staff on a level of effort basis to support. Provide additional staffing to address emergent E&DCRs and work off the current backlog. Adjust the make-up of the team expertise (civil, piping, electrical, etc.) to support the different stages of construction. (Priority 1) Locate dedicated WEC engineering response teams to the site with design authority to resolve E&DCR issues. (Priority 2) Establish a WEC/CB&I "light structures" design organization at the site to work with construction to redesign and reissue piping, HVAC, conduit, and tray supports that have been identified as difficult or impossible to construct (in advance of the construction need date), and to support the design of field run commodities such as conduit and instrumentation tubing that have yet to be installed.
E2	<p><u>Observation(s)</u></p> <ul style="list-style-type: none"> The work package data prepared by field engineering is checked for content accuracy and completeness in accordance with CB&I procedures NCSP 2-19, NCSP 2-12, NCSP 2-7, and CSI 2-19. All of the required information is then placed into a binder(s) and sent to document control, who then manages the daily sign out, sign in of the work package by the craft. In some instances, the work package is in three binders – instructions, engineering drawings, and E&DCRs (change paper not yet incorporated into the parent drawings). Simplification of the entire work package is desired, and it was identified that a task force was being assembled to figure out how to make the process simpler and streamline the work package physical size. Approximately 2,000 work packages have been written to date; 800 of these are closed; 1,200 in some state of being worked, 100-200 are checked out from document control daily, and 18,500 to 24,000 total are expected to be written for Units 2 and 3. <p><u>Recommendation(s)</u></p> <ul style="list-style-type: none"> (Priority 1) Use a Six Sigma approach to simplify the size and content of the work package. (Other) Strictly enforce within WEC and CB&I design engineering that no more than four change papers against a design drawing may exist before they must be incorporated into the parent document for re-issue to construction.
E3	<p><u>Observation(s)</u></p> <p>During an October 13, 2015 visit to the Unit 2 containment document control drawing annex, more than several drawings were identified as being annotated with 10 or more changes. Document control personnel had previously indicated that per plant requirements, drawings should be revised after four (4) changes. In an unscientific sampling of ten (10) drawings, four (4) were found to exceed four (4) changes with one containing 33 active changes. The potential impacts of excessive changes to existing drawing revisions include the additional time burden</p>

Table 3-1. Engineering Observations and Recommendations	
No.	Description
	<p>on field personnel performing work using the drawings and document control personnel maintaining the drawings. Additionally, it complicates the ability of field workers to verify that work is being performed to the latest approved drawing.</p> <p><u>Recommendation(s)</u></p> <ul style="list-style-type: none"> • (Other) Review current processes and resources to determine why plant drawing revision requirements are not being met. Based on the results, revise process and/or add resources to ensure that engineering drawings are revised in a timely manner.
E4	<p><u>Observation(s)</u></p> <ul style="list-style-type: none"> • Numerous late (just prior to or during installation) N&Ds to document installation issues are being created, processed, and implemented to support supplier or constructability issues. • The forecast and scheduled/work-off plan was unclear to the assessment team with respect to N&Ds. • There appears to be inadequate coordination between construction, field engineering, and design engineering on preliminary and final disposition N&Ds. <p><u>Recommendation(s)</u></p> <ul style="list-style-type: none"> • (Priority 2) Initiate a focused effort on planning and review of design, vendor/contractor documents and tolerances to eliminate or have early identification of N&Ds. • (Priority 2) Establish a forecast based on historical data and staff on a level of effort basis to support. Adjust the make-up of the team expertise (civil, piping, electrical, etc.) to support the different stages of construction. • (Priority 2) Create/revise the process to enhance coordination between construction, field engineering, and design engineering for N&Ds.
E5	<p><u>Observation(s)</u></p> <ul style="list-style-type: none"> • The Strategic Planning Group reviews electrical, piping, and I&C for everything but yard work. The deliverables from this group includes a "room plan" and the goal is to perform this review approximately 6-9 months in advance of when the work is scheduled; to identify all the things that must be installed in a room prior to the room ceiling being installed. The group has a staff of 14. • Review priority is set by construction. Approximately 3,000 work packages have been scoped (electrical and piping only) and approximately 100 have been planned electronically (several more were recently reviewed with the assessment team). Not much electrical design has been completed and issued for construction to be available and that which is issued is considered problematic in many cases. • Pipe supports seem overly complicated; in containment electrical supports are "box beams"; room plan being developed to support the boundary information package (BIP) to support system turnover. <p><u>Recommendation(s)</u></p> <ul style="list-style-type: none"> • (Priority 2) The standard plant 3D model should be updated so that it accurately reflects the final design so that it will better support understanding what is in a room that must be constructed. • (Priority 2) If possible, the 3D model should be put under configuration control so that images

Table 3-1. Engineering Observations and Recommendations	
No.	Description
	<p>and data drawn from it can be relied on.</p> <ul style="list-style-type: none"> • (Priority 2) E&DCRs and N&Ds should be rolled into design drawings and the 3D model to reduce the potential for human error in missing a requirement shown on these change documents.
E6	<p><u>Observation(s)</u></p> <ul style="list-style-type: none"> • Several significant problem areas are being actively worked to resolution: <ul style="list-style-type: none"> — Chilled water system. Redesign is in progress and will be resolved by December 2015. — Turbine drain and vent system. Redesign is in progress and will be resolved by December 2015. — Annex building reinforcing steel. This issue is being resolved at Vogtle. — Main steam piping (WEC inside auxiliary building; CB&I outside auxiliary building). WEC over-specified the main steam pipe wall thickness. This resulted in a new stress analysis that shows supports overloaded and being redesigned (thicker pipe equals more weight than originally analyzed); created a major problem with the main steam pipe anchor at the auxiliary building wall (stargate). • Equipment preservation is requiring engineering to revise specifications and go back to vendors to obtain new vendor submittals for equipment preservation requirements not originally anticipated to be required (because equipment is being delivered to the site well in advance of the construction need dates and construction need dates have slipped (compounding the problem)). <p><u>Recommendation(s)</u></p> <ul style="list-style-type: none"> • (Other) Assess the practicality of buying new main steam pipe with the correct wall thickness rather than performing counter boring operations in the field and redesign of the stargate anchor, which may require changes to a 'special processes' specification or manual. • (Priority 1) Evaluate if equipment site delivery can be delayed to minimize field equipment protection problems prior to installation in the plant.
E7	<p><u>Observation(s)</u></p> <ul style="list-style-type: none"> • An E&DCR is required for all changes, including software (e.g., calculation revision). • WEC performed an E&DCR study for the period May 15 – August 15, 2015. E&DCRs were classified as home office issues (unsolicited change), construction impact, and exceptions. A new study covering August 15 – December 15, 2015 is in progress. • Work package planning (6 months in advance of construction) can identify issues requiring resolution. WEC is part of the new site Strategic Planning Group. • The construction planning and constructability review efforts are not far enough out in front of the construction effort to minimize impacts. <p><u>Recommendation(s)</u></p> <ul style="list-style-type: none"> • (Priority 1) Intensify the efforts of the Strategic Planning Group, work package planning, constructability reviews, etc. to identify design changes needed well in advance of the construction need date. • (Priority 1) Look-ahead beyond where construction is today and work with the site Strategic

Table 3-1. Engineering Observations and Recommendations	
No.	Description
	Planning Group to roll in E&DCRs for all design documents associated with the room being planned, so that the room plan deliverable has the most up to date design documents.
E8	<p><u>Observation(s)</u></p> <ul style="list-style-type: none"> The two major design areas yet to be issued are electrical and civil: <ul style="list-style-type: none"> Electrical – above El. 100' in the auxiliary building (trays and conduit). Civil – above El. 100' in the auxiliary building – C7 reinforcing steel release, CA50 modules; A5 (El. 135') and A6 (El. 117') floors (embeds for as-procured commodities); floor modules SPL18 and SPL51 – China experience – reviewing first 20% of changes and categorizing as "must have"; a simplification design package for "must haves" to be issued by WEC (in schedule). <p><u>Recommendation(s)</u></p> <ul style="list-style-type: none"> (Priority 1) Place emphasis on getting these new designs completed and associated drawings issued as soon as possible to construction/procurement. (Priority 1) Conduct a constructability review meeting with construction prior to issue in order to avoid the need for changes.
E9	<p><u>Observation(s)</u></p> <ul style="list-style-type: none"> The resolution of open items and emergent site issues is shared with Vogtle for standard plant (1 x 4) designs. WEC has three (3) dedicated response teams in Cranberry to address emergent issues – civil-electrical, modules, mechanical. Includes about 80 engineers (doubled in size since the April 30, 2015 design complete declaration). Post-Engineering Design Closure Plan – includes items such as hot functional testing plan, startup support, piping and supports as-built reconciliation, document turnover program, etc. WEC is identifying and verify this emergent work now. These activities will be added to the schedule, resource loaded, and tied to construction/startup/fuel load. Domestic hold removal is tracked and statused weekly. These are tied to construction need dates and consist of holds on design drawings that must be released so that construction can proceed with the work identified within the hold. These are reviewed weekly with project controls and statused weekly on a dashboard. The EDC dashboard shows an increase in "Approved DCPs/Doc Pairs" requiring closure over the past several weeks with most coming from civil, which is indicative of the current major construction work front. A weekly four hour meeting is held with engineering to review/status the to-go schedule and the above items. <p><u>Recommendation(s)</u></p> <ul style="list-style-type: none"> (Priority 1) WEC engineering should continue to stay on top of emergent issues including maintaining focus on the increase in Approved DCPs/Doc Pairs requiring closure. (Priority 1) Add appropriate staff to work off the backlog of approximately 1,150 of 1,400 items identified on the September 14, 2015 dashboard. (Priority 2) Complete the identification and resource loading of the post-engineering design closure plan and load activities/resources into the P6 schedule. Assess changes to staffing that may be required to support this work.

Table 3-1. Engineering Observations and Recommendations	
No.	Description
	<ul style="list-style-type: none"> (Other) The weekly four hour engineering schedule meeting is a good practice and should continue.
E10	<p><u>Observation(s)</u></p> <ul style="list-style-type: none"> The Strategic Planning Group was recently formed to review and prepare a room plan which, at a high level, identifies all the construction work required to be completed in a given plant room, and a general sequence of installation of the commodities within the room. The room plan review is planned to be performed approximately 6 to 9 months in advance of the construction start date for the room/area. Operating procedures for the Strategic Planning Group have been approved. The current staff is 14. The effort identifies only electrical, piping, I&C, and modules work for a given room. No material quantity takeoffs or yard work planning is included. Field engineering does all other construction planning. The priority of room plan development is set by construction. The room plan process came into existence because of the difficulty of pulling together all of the design drawings for all commodities required to be installed in a room, coupled with trying to comply with issued/approved but not incorporated change paper (E&DCRs). The room plan deliverable is input to work package planning that is performed by the central planning group which is newly formed and has a staff of 28. Approximately 3,000 work packages (electrical, mechanical) have been scoped. Approximately 100 rooms planned to date (electronically). Work packages are being made smaller and reasonably scoped through interactions with CB&I construction; prepared by commodity (e.g., piping, pipe support, electrical, etc.). Preliminary findings in the room plans are that piping and electrical tray supports are complicated and congested and will be a significant challenge to install. This could result in a significant amount of emergent E&DCRs and N&Ds similar to the civil design problems. Work packages are being scoped to be consistent with the startup boundary information plans so that they support system turnover to the pre-op test group. The 3D model is used but it is not up to date; commodity clashes (intersections) are seen and noted. Piping and electrical support locations cannot be easily tied to civil drawing baseplates. This requires a lot of research to figure out. Indications are that electrical may also be an issue. Supplemental (miscellaneous) steel to support pipe and tray supports is not yet designed which results in change paper to get it fabricated and installed. Two-inch diameter and under conduit/piping is field routed. <p><u>Recommendation(s)</u></p> <ul style="list-style-type: none"> (Priority 1) Engineering should get ahead of construction and get E&DCRs incorporated into design drawings so that construction planning is simplified and takes less time. (Priority 1) A construction priority should be work package closure. (Priority 1) The Strategic Planning Group function should continue because of the issues that have been identified to date with the engineering design drawings. (Priority 2) Set up in the field a design engineering "light structures" group to facilitate field

Table 3-1. Engineering Observations and Recommendations	
No.	Description
	walkdowns to support preparing designs for 2" diameter and under support designs, and issue the design drawings.
E11	<p><u>Observation(s)</u></p> <p>Based on discussions with SCE&G engineering and licensing personnel:</p> <ul style="list-style-type: none"> • SCE&G does not believe WEC engineering is ahead of construction. • WEC has limited civil/structural resources in their Cranberry office to deal with the civil licensing issues and is not as knowledgeable of ACI 349 as the NRC. • SCE&G believes there will be more emergent civil issues, e.g., construction tolerances. • The piping Design Acceptance Criteria (DAC) ITAAC may become a potential problem area. The Consortium has to inform the NRC when piping stress analyses are complete so that NRC can inspect them. • SCE&G expects problems with digital I&C. <p><u>Recommendation(s)</u></p> <ul style="list-style-type: none"> • (Other) No specific recommendations.
E12	<p><u>Observation(s)</u></p> <ul style="list-style-type: none"> • Module design was not complete at time of contract execution. The change from A36 to A572 steel created fabrication issues. • "As assembled" final module tolerances are driven by ITAAC requirements. Fabrication tolerances had to be tighter to meet 'as assembled' tolerances. • Different tolerances are specified for different modules. • Fabricators are finding design errors. • Some large mechanical modules are complex and not yet fabricated. • The WEC site team supports onsite module work. WEC Cranberry supports in shop module fabrication. <p><u>Recommendation(s)</u></p> <ul style="list-style-type: none"> • (Other) Correctly sequence the placement of mechanical and floor modules into Unit 3 CA20 and CA01 modules prior to installing them in the unit.
E13	<p><u>Observation(s)</u></p> <p>A significant number (greater than 1,000) WEC drawing holds exist that are impeding procurement and construction activities.</p> <p><u>Recommendation(s)</u></p> <ul style="list-style-type: none"> • (Priority 1) As part of the weekly schedule update meeting, review near term holds and commit to getting a release date for hold removal and document issue to support procurement and construction work.
E14	<p><u>Observation(s)</u></p> <ul style="list-style-type: none"> • The to-go WEC engineering schedule comprises roughly 75-85% activities that are 'software' only; i.e., closing out corrective actions, rolling in outstanding E&DCRs, archiving calculations, etc., most of which is required to support fuel load, not the day-to-day construction work. • The Post-Engineering Design Closure Plan is meant to be that engineering work necessary to get the plant to fuel load, but is not necessarily tied to immediate construction work; e.g., hot

Table 3-1. Engineering Observations and Recommendations	
No.	Description
	<p>functional testing plan, SIT/ILRT testing plan, engineering support to startup; piping and supports as-built reconciliation; structural adequacy evaluation, document turnover to the Owner, etc. WEC is working to develop the work scope, schedule, and resources required for completing or supporting these activities.</p> <p><u>Recommendation(s)</u></p> <ul style="list-style-type: none"> • (Priority 1) Continue with the weekly schedule review meetings to ensure these engineering activities are getting completed in addition to supporting emergent site issues and completing any unfinished to-go design engineering. • (Priority 2) Assemble a team of subject matter experts to develop the work scope, schedule activities, and resource requirements for Post-Engineering Design Closure. This will enable determination of the need to add resources later in the project or to reassign personnel to support these work activities.
E15	<p><u>Observation(s)</u></p> <p>Personnel assigned to the onsite document control team are working significant overtime. Two document control staff persons were recently added and an additional member may be added in the near future. The document control team is challenged with the volume of work necessary to support work packages and drawing maintenance.</p> <p><u>Recommendation(s)</u></p> <ul style="list-style-type: none"> • (Other) Perform a review that leverages the experience of current team members who have worked other commercial nuclear sites and develop a "best in class" approach to document control. Alter work processes to incorporate the things that worked well at other locations and avoid the mistakes that may have occurred elsewhere. Encourage a questioning attitude among team members that allows the question, "why are we doing this?" to be asked of all phases of the document control process. • (Other) Implement the use of bar coding to reduce the amount of time craft personnel spend in retrieving and submitting work packages.
E16	<p><u>Observation(s)</u></p> <ul style="list-style-type: none"> • Based on discussions, site document control has a challenging task to meet existing work package demands; though, from discussion, it appears that electronic processes do assist in package processing and production/reproduction. Document control is staffed with fourteen (14) workers, providing coverage 24 hours per day for six (6) days each week, with staff on call for Sunday work. • The work control process places a significant administrative burden on those developing, maintaining, and administering work packages. Field work portions of the packages contain numerous sign offs, requirements for shift work accomplishments to be documented, etc. These requirements begin once a package has been picked up from document control at the beginning of a shift, transported to the work site, pre-job brief performed, and work allowed to begin. At the end of shift, the package is returned to document control, where entries/updates provided during the shift are documented. The next shift continues the process when the shift representative picks up the package to begin the next phase of work.

Table 3-1. Engineering Observations and Recommendations	
No.	Description
	<p><u>Recommendation(s)</u></p> <ul style="list-style-type: none"> • (Priority 1) Continue the cross functional team identified by the Consortium that is tasked to review the work control process (including document control) and include consideration of the following items: <ul style="list-style-type: none"> ---- Reducing the volume of paper in work packages ---- Minimizing worker entries to those absolutely necessary to document work performed ---- Implementing alternative means of making worker entries (electronic tools) ---- Performing field assessments of work package activities to include worker/foreman feedback/suggestions ---- Eliminating documentation not specifically needed in the field for workers to perform work ---- Developing work packages for smaller, more discrete work scope.

4. Procurement

This section describes the assessment of the procurement aspects of the project. Section 4.1 provides a summary of the current status. Section 4.2 provides procurement observations and recommendations.

4.1 Current Status

The project is supported from a procurement perspective by CB&I and WEC, with CB&I's efforts supported both onsite and in their Charlotte, NC offices and WEC supported by their Cranberry, PA offices.

The project procurement teams are focused on the to-go purchases and material deliveries as reported via the ROYG report and discussions with site personnel. The September 28, 2015 ROYG report provides the following information regarding the to-go purchases and the delivery status of components tied back to the schedule:

Category	WEC Remaining POs to be Placed	WEC Remaining Equipment Delivery	CB&I Remaining POs to be Placed	CB&I Remaining Equipment Delivery
Red	6	54	17	1,159
Orange	2	29	7	218
Yellow	1	27	1	143
Green	22	347	0	1,387
N/A	--	--	2	0
Total	31	457	28	2,907

Currently, the procurement portions of the ROYG report do not accurately reflect the project's current requirements or needs. Bechtel's ability to properly assess the impact of the above data in relation to the project critical path was hindered because CB&I was completing a schedule adherence project. This effort, scheduled for completion by October 31, 2015, is planned to result in changes to the ROYG report to properly identify material requirements that do not support the project schedule. Once these changes are identified, the Consortium plans to implement mitigation plans to resolve identified problem areas.

CB&I site procurement is focusing on several efforts which are of importance and in various stages of completion:

- Establishing and fully implementing a min/max strategy and program that supports construction needs. There are eight permanent plant material blanket purchase orders (BPOs) in place and an additional 16 in process with forecasted awards dates. Coordination with construction is needed such that identification of material(s) is made so that BPOs can be put in place with appropriate min/max levels established based upon

construction's requirements and usage rates and supply lead times. This is key to implement an effective program that supports the project's daily requirements.

- Inventory validation of material under the control of CB&I procurement, which currently has a 48% level of accuracy.
- Warehouse and laydown area availability and proper utilization.
- Commercial grade dedication (CGD) program implementation and adherence.

Overall, the current Consortium procurement program has the basic procedures and processes in place to complete the work. There are, however, areas for improvement and potential risks that are identified in the sections below.

4.1.1 Supply Chain Commitment and Support

Industry-wide, the nuclear supply chain continues to be in a period of restart and growing pains. Although the Consortium has nuclear quality programs in place, they are still adjusting to the existing and new regulations and documentation requirements. There has been a learning curve that is still in progress. The challenge is to keep the supply base in such a form as they can be profitable and provide a product or service at a competitive price.

The Consortium is challenged with the amount of design changes and documentation, which has presented commercial issues that have to be dealt with and resolved. The Consortium must be cognizant of and sensitive to supply chain issues, as they need to see that nuclear power requirements will not negatively impact their ability to do business.

4.1.2 Commercial Grade Dedication

Commercial grade dedication (CGD) is an accepted and necessary element of the nuclear supply chain. The issue is compliance with the requirements and the supply chain's understanding of their responsibilities as conveyed in the commercial agreement between the project and a given supplier or contractor. Additionally, the conveyance of project specific requirements is critical to the proper implementation.

There have been concerns with the proper conveyance of project requirements to the supply chain and their understanding of the project's needs. On the Consortium side, it was conveyed that there was a lack of understanding of the CGD process and management thereof. This was evident in the supply of safety related fabricated end beds. These concerns have been identified and are being addressed, with the result being improved awareness of project requirements by the suppliers and applicable project personnel. The key point here is the need for Consortium and supplier personnel to fully understand the CGD requirements and processes. There must be continued focus with this effort for the timely delivery of material and equipment to the project in accordance with construction need dates.

4.1.3 Preventative Maintenance Program

The implementation of and adherence to a robust preventative maintenance program is critical to achieving schedule compliance. With equipment and material deliveries currently onsite and not being issued to construction, the required preventative maintenance must be conducted and properly managed. This is a recognized concern and is being addressed by the construction and procurement departments. The focus and timeliness of adherence to programmatic requirements must be enhanced. It was observed and recognized by the CB&I procurement team that attention to this process was lacking and that the project needs to dedicate the resources accordingly. For material to be in support of the construction need date, it must be in compliance with both the technical requirements as per the purchase specification and the supplier-recommended maintenance program. If these are not followed, the construction need dates may not be met due to required repairs or complete replacements. Thus, preventative measures must be scrupulously followed to ensure that the schedule is not affected.

4.1.4 Documentation

The required documentation (certification packages with shipments), as it relates to the material supply, is one of the key elements of the final turnover package to the Owner for permanent plant retention. In discussions with the CB&I procurement team, it was described how errors are continuing to be identified in the required certification paperwork. These errors should have been caught either by the supplier or the CB&I inspector reviewing the packages prior to shipment. It is critical that the supply chain and CB&I assigned personnel fully understand this requirement and comply, since the lack of proper turnover documentation can adversely affect the schedule. Further, the project's prompt review of received documentation is critical, because if there are issues with it, they need to be raised and resolved immediately so that the material can be released in support of the schedule.

4.1.5 Storage Facilities

Currently, the site conditions are such that there is insufficient space to properly receive, store, maintain, and manage material. There is a program in place to evaluate this issue, and efforts are underway to expand and manage the outcome. There must be a concerted effort to complete this effort so that the material management process can become more efficient and timely to construction needs. Additionally, if material cannot be maintained, stored, and located for issuance in a timely manner schedule will be affected.

4.2 Observations and Recommendations

Procurement observations and recommendations are identified in Table 4-1.

Table 4-1. Procurement Observations and Recommendations	
No.	Description
P1	<p><u>Observation(s)</u></p> <ul style="list-style-type: none"> Observed the need for an enhanced level of communication, so that the site organization knows the detail of deliveries and issues associated with 1x4 material/equipment and module procurements as there are issues that have to be addressed and communicated accordingly. There are multiple meetings at the site in which materials are discussed. Proper and accurate status must be conveyed. Additionally, from a material management and storage perspective, the status and specifics of deliveries and site need are required due to the limitations of on-site storage. <p><u>Recommendation(s)</u></p> <ul style="list-style-type: none"> (Other) Improve the process of conveying status and associated details of issues such that sufficient details are known and can be properly conveyed. (Other) Establish a coordination meeting for procurement only so that there is a coordinated effort between site and Charlotte procurement activities.
P2	<p><u>Observation(s)</u></p> <ul style="list-style-type: none"> During multiple walks and drives through of the warehouses, tents, and laydown areas, it is evident that there is insufficient space for level C and D storage. Specifically, there are 38 +/- floats with pipe spools that require the receipt process completed as there are storage issues. There are currently 16 different locations covering both on and off site storage which are quite spread out over the project site. Additionally, material is being held at the multiple suppliers as there is no place to store at site. <p><u>Recommendation(s)</u></p> <ul style="list-style-type: none"> (Priority 1) Complete a needs analysis to identify and finalize the required space. (Priority 1) Perform a comprehensive manufacturing schedule review against construction need dates and deliveries forecasted for the next 6 months. Work with the supply chain as appropriate to delay manufacture to allow for future shipment at the appropriate time. (Priority 1) Prioritize issues with Level C storage requirements.
P3	<p><u>Observation(s)</u></p> <p>During the review of laydown and warehouse areas, it was stated that there was material no longer usable or needed due to design changes, particularly rebar and pipe spools. There is a delay in the process of identifying what material is no longer required and its appropriate disposition, leading to an ineffective allocation of space.</p> <p><u>Recommendation(s)</u></p> <ul style="list-style-type: none"> (Other) Expedite the finalization of the surplus process and implement it quickly so that space can be reallocated to incoming material. (Other) Consortium management must drive this priority activity, along with Owner input, since space is at a premium.
P4	<p><u>Observation(s)</u></p> <p>During multiple walk-throughs of the site laydown yards, there is a mix of material within the yards instead of having a program of commodity management by yard. This lends itself to inefficient material handling for a given work package. Having material in multiple locations can result in double handling and present challenges to basic material management.</p>

Table 4-1. Procurement Observations and Recommendations	
No.	Description
	<u>Recommendation(s)</u> <ul style="list-style-type: none"> • (Other) Recognizing that this will be a significant time, resource, and logistical issue, work to reorganize the laydown yards with a focus on incoming material. Work towards staging by commodity and, where it makes sense, by work package.
P5	<u>Observation(s)</u> <ul style="list-style-type: none"> • Inventory validation is currently at a 48% accuracy level. This level of inventory control lends itself to not knowing where material is or what is in stock, resulting in the withdrawal process being time consuming. • Further, for bulk type items, construction doesn't know what's on hand; thus, their ability to plan is hindered. It was evident that with the current situation, material is just reordered as it is not known if it was onsite, used, etc. <u>Recommendation(s)</u> <ul style="list-style-type: none"> • (Priority 1) Complete the inventory revalidation effort which is planned for completion by the end of 2015. • (Priority 1) Establish a program to continually validate inventory.
P6	<u>Observation(s)</u> <ul style="list-style-type: none"> • During multiple walk-throughs of the CB&I laydown yards, the majority of pipe spools for identification purposes have paper tags rather than metal tags. It was observed that with the time material is held in laydown yards the paper tags have deteriorated or detached. • It was observed that some radio frequency identification (RFID) tags have also become detached. It was conveyed that, with the extended storage durations, they are experiencing failure of the RFIDs, which necessitates their replacement. Consequently, material identification and location is problematic. <u>Recommendation(s)</u> <ul style="list-style-type: none"> • (Priority 2) For material currently in CB&I's control, as part of the re-inventory process, create and attach new tags. Use weather resistant type tags that can be printed onsite. • (Priority 2) For future shipments, CB&I Laurens must use and attach metal tags instead of paper. It is assumed that a specification change will be needed to facilitate this new method of identification. • (Priority 2) As part of the re-inventory process, validate RFID operability and change accordingly if required.
P7	<u>Observation(s)</u> <p>In regards to material management and associated preventative maintenance requirements, it was observed that with the extended storage period for material in the onsite laydown yards and warehouses, there are deficiencies with the management and the administration of that process and the need for additional focus in this area. With the lack of proper management, i.e. maintenance, there is the risk that if material has to be replaced for whatever reason, there is the potential for a schedule issue since the replacement lead time may not support the schedule.</p> <u>Recommendation(s)</u> <ul style="list-style-type: none"> • (Priority 2) Enhance the material storage program such that it is properly monitored and maintained as a joint effort between procurement and construction.

Table 4-1. Procurement Observations and Recommendations	
No.	Description
	<ul style="list-style-type: none"> • (Priority 1) Reconfirm that all items requiring maintenance are properly included in the material storage program. • (Priority 2) Identify and disposition items that have issues/problems quickly so that if replacement or repair is required, the replacement properly supports the schedule.
P8	<p><u>Observation(s)</u></p> <ul style="list-style-type: none"> • There is a material management min/max system and process in place, but it is not fully developed. • Currently, there are eight permanent plant and 24 non-permanent plant (16 of the BPOs are associated with civil products); and 16 permanent plant BPOs in the schedule for establishment. The use of these BPOs is not fully implemented and used by the project. • All requisitions are screened for material that may be in the system. <p><u>Recommendation(s)</u></p> <ul style="list-style-type: none"> • (Priority 1) Expedite the implementation of the identified BPOs so that construction can use them rather than writing individual material requisitions. • (Priority 1) In developing the "list" of BPOs in place that would support a min/max system, construction and field engineering personnel should help define what products should be maintained within the min/max system. • (Priority 1) Educate site personnel on the use and process of the BPOs and the min/max system.
P9	<p><u>Observation(s)</u></p> <ul style="list-style-type: none"> • In discussion with the materials team, there was a lack of planning and coordination for material requests/withdrawals. The majority of material requests come in as a "rush". • Material requests generally are generally not submitted to procurement with any lead time, coordination, or planning, which results in an inefficient method of operation. • Work is performed by work package, and materials are scheduled in accordance with the schedule. <p><u>Recommendation(s)</u></p> <ul style="list-style-type: none"> • (Other) Work with construction and establish a "planning tool" such that the two organizations better communicate needs so that requests are not in a continual rush mode of operation. • (Priority 1) Establish a two week look-ahead planning tool. This is needed as material for a given request is most likely in multiple locations with the current laydown yard situation. • (Other) Consider storing material by work package, as this will make withdrawal more efficient and act as a confirmation that all material is on-site and available.
P10	<p><u>Observation(s)</u></p> <ul style="list-style-type: none"> • In reviewing schedule status reports and in discussions with procurement management, it is unclear if all options have been exhausted with respect to sources of supply and allocation of work to a given module fabricator. CB&I is analyzing work allocation based on current performance, shop loading, and construction schedule needs. • It was said that this activity is complete and that the distribution and proper allocation of work has improved. Additionally it was stressed that the performance of assigned fabricators was improving. With the past performance of the fabricators along with design changes, intrusive management of these fabricators is needed. As these issues are of a commercial nature,

Typo
Corrected
11/16/15
[Signature]

Table 4-1. Procurement Observations and Recommendations	
No.	Description
	<p>Bechtel did not see the details.</p> <ul style="list-style-type: none"> Based on a review of the September 28, 2015 ROYG report (Item 15.16), there are multiple deliveries in the red indicating that they do not support the schedule. <p><u>Recommendation(s)</u></p> <ul style="list-style-type: none"> (Priority 1) Continue to analyze work allocation based on current performance, shop loading, and construction schedule needs. (Priority 1) Confirm the ability of the existing eight module fabricators to support the schedule with the resources, flexibility, and wherewithal to handle the work. (Priority 1) Complete an analysis of the ROYG report (Item 15.16) and their associated fabricator and develop a plan to have deliveries made in accordance with the schedule.
P11	<p><u>Observation(s)</u></p> <ul style="list-style-type: none"> There is an issue with compliance with project and Purchase Order requirements to support the accuracy of required documentation. This issue seems to cross all of the procurement activity. CB&I's process stipulates reviews and accepts documentation packages at the supplier's facilities, as appropriate. <p><u>Recommendation(s)</u></p> <ul style="list-style-type: none"> (Other) Reconfirm that Purchase Order and/or Contract requirements are clearly and properly stated. (Other) Re-review with the supply chain their understanding of requirements. Monitor for trends and address with supplier management. (Other) Address the training of individuals reviewing documentation packages to ensure their understanding of the requirements and processes.
P12	<p><u>Observation(s)</u></p> <ul style="list-style-type: none"> In general discussions with CB&I's procurement manager on risk items, a lack of overall effort and focus was observed. Items are identified but it is not clear how diligently CB&I is managing these risk items to closure. Risk Register Item #67—Critical Equipment/Vendor Supply and Oversight—is still under development and owned by site procurement. <p><u>Recommendation(s)</u></p> <ul style="list-style-type: none"> (Other) Hold procurement accountable to close risk items as scheduled.
P13	<p><u>Observation(s)</u></p> <ul style="list-style-type: none"> After meeting with CB&I's procurement manager, there appears to be a workable process in place for managing purchasing, expediting, and materials management activities that has evolved as the project has grown. The observation is whether there are enough resources applied to properly monitor/manage activities. Additionally, design changes were a recurring topic of discussion regarding the management of the current eight agreements for module fabrication. When looking at the ROYG procurement report, there are multiple modules that are in the red. <p><u>Recommendation(s)</u></p> <ul style="list-style-type: none"> (Other) Complete the analysis of ROYG report to properly assess the schedule. Ensure proper

Table 4-1. Procurement Observations and Recommendations	
No.	Description
	<p>attention/monitoring is in place.</p> <ul style="list-style-type: none"> • (Priority 1) Reconfirm the expediting resources available to manage the fabrication Purchase Orders and improve schedules. • (Priority 2) Improve the efficiency of change management, as it takes too long to resolve issues that will allow completion of fabrication.
P14	<p><u>Observation(s)</u></p> <ul style="list-style-type: none"> • In discussions with all groups, the subject of CGD was brought up and the concern of the project requirement being properly conveyed and the supply chain complying and knowing "what to do". • Further, with the evaluation process being time consuming and with the current submittals under review from suppliers and resulting outcome, the effect is unknown. <p><u>Recommendation(s)</u></p> <ul style="list-style-type: none"> • (Priority 2) Expedite the resolution of CGD issues so that if the material has to be replaced, it can be in time to support schedule. • (Priority 2) Revalidate the Purchase Orders that have compliance issues so that verification is documented and all material is accounted for. • (Priority 2) Increase the interactions with suppliers to ensure the Purchase Order/specification requirements are understood and CGD is properly supported by the supplier and project engineering.
P15	<p><u>Observation(s)</u></p> <ul style="list-style-type: none"> • CB&I uses the Smart Plant operating platform as their requisitioning tool onsite. This program appears to be functional from the creation and routing of a requisition through to the assigned buyer and subsequent award. However, there is no expediting module within Smart Plant, thus the tracking of open Purchase Orders is done manually via an Excel tracker, and there is no mechanism in the system for an individual to look up the status of an open Purchase Order. • It was also noted that the ability to track requisition/Purchase Orders by work package was not available; this function was also done manually. The issue here is that an item must be tracked manually rather than using the system, which is an inefficient means of monitoring materials and assuring all material is accounted for in a given work package. • It was noted that the site procurement team has manually created status reports that track open orders and are used with their coordination with construction. <p><u>Recommendation(s)</u></p> <ul style="list-style-type: none"> • (Priority 2) Expand/enhance existing tools to accommodate site needs, such that status data can be maintained and available for view by the project. • (Priority 2) Develop a system whereby data management/entry is completed within one system.

Table 4-1. Procurement Observations and Recommendations

No.	Description																					
P16	<p><u>Observation(s)</u></p> <p>Review of the ROYG report shows the following:</p> <table><tr><th></th><th>WEC Remaining Equipment Delivery</th><th>CB&I Remaining Equipment Delivery</th></tr><tr><th>Category</th><th>Count</th><th>Count</th></tr><tr><td>Red</td><td>54</td><td>1,159</td></tr><tr><td>Orange</td><td>29</td><td>218</td></tr><tr><td>Yellow</td><td>27</td><td>143</td></tr><tr><td>Green</td><td>347</td><td>1,387</td></tr><tr><td>Total</td><td>457</td><td>2,907</td></tr></table> <ul style="list-style-type: none">• CB&I procurement management described that they recognize this data is not correct in the ROYG report. A "schedule adherence activity" (project) by discipline is currently underway for the past 8 weeks, as there are activities that are not correctly tied, thus the data in ROYG is incorrect.• The schedule adherence project was to be completed by October 31, 2015 and is expected to result in clear visibility as to what commodity/equipment requires a mitigation plan from an overall perspective versus an emergent need on a daily/weekly/monthly basis. Thus, as of the writing of this report, the use of the current ROYG report data is not useful in the schedule analysis. <p><u>Recommendation(s)</u></p> <ul style="list-style-type: none">• (Priority 1) Complete the schedule adherence effort as planned by October 31, 2015.• (Priority 1) Evaluate resource needs to properly manage items identified in the ROYG report as impacting construction need dates.		WEC Remaining Equipment Delivery	CB&I Remaining Equipment Delivery	Category	Count	Count	Red	54	1,159	Orange	29	218	Yellow	27	143	Green	347	1,387	Total	457	2,907
	WEC Remaining Equipment Delivery	CB&I Remaining Equipment Delivery																				
Category	Count	Count																				
Red	54	1,159																				
Orange	29	218																				
Yellow	27	143																				
Green	347	1,387																				
Total	457	2,907																				
P17	<p><u>Observation(s)</u></p> <p>In discussions with the site procurement team regarding work package planning (creation/issuance), it was observed that late issuance translates into late requisition creation and the need for material to support construction need dates turns many procurements into a "rush" situation. The planning and issuance of work packages is out of synch with the procurement cycle and inhibits the procurement and delivery of material in an orderly manner.</p> <p><u>Recommendation(s)</u></p> <ul style="list-style-type: none">• (Priority) Adjust work package planning to allow for a "normal" state of operation for the downstream activities after the work package is issued.																					

5. Construction and Project Controls

This section describes the assessment of the construction and project controls aspects of the project. Section 5.1 provides a summary of the current status. Section 5.2 describes the analysis of the project construction schedule. Section 5.3 provides construction and project controls observations and recommendations.

5.1 Current Status

5.1.1 Introduction

As part of the assessment, Bechtel's construction and project controls personnel gathered a wide variety of information on the history and current status of the effort, such as:

- Reviewing organization charts
- Touring various areas of the site (e.g., Units 2 and 3 nuclear islands, turbine areas, module assembly building (MAB) and laydown areas, temporary facilities)
- Reviewing schedule information, including indirects, bulk quantities, installation curves, manpower curves, and weekly/monthly reports
- Attending safety meetings, plan of the day (POD) meetings, module status meetings, and area schedule meetings
- Meeting with a number of individuals to understand the work packaging program, quality organization, project controls organization, engineering status, procurement program, constructability and strategic planning, startup and turnover plan, and the document control process
- Holding meetings to understand shield wall installation schedule, management of indirects, craft recruiting (industrial relations), and raceway and hanger installation challenges.

Early in Bechtel's assessment, the Consortium presented to Bechtel their organizations and the status of and the plan for the project. The Consortium provided Bechtel the estimated bulk quantities for installation, as well as the budgeted jobhours and performance to date by general account (such as concrete, piping, and electrical; but no further breakdown). The Consortium would not, however, share the unit rates. **Without the unit rates, the Bechtel estimate of the jobhours needed to complete the project is based on Bechtel's historical records and estimates of work activities observed during their assessment.**

It was apparent that contractual issues between the parties are impacting the work. Timely resolution of problems does not seem to have the quick response needed by the project to achieve the schedule.

The project can be proud of its safety record, especially the months of August and September 2015 where the project had only one recordable each month. The cleanliness of the site and work areas really stood out during Bechtel's walkdowns.

Some of the primary contributing factors to project performance include:

- Working too many hours for an extended period — the work schedule is a 58 hour work week (5–10s and 1-8) with selected overtime
- Non-manual turn over — the rate for the year to date is greater than 17%
- Amount of time the craftsmen are at the work face — numerous issues are keeping the craftsmen from performing work
- Engineering design changes during construction and slow resolution of issues — work is continually being impacted
- Organization at site — The Project Management Organization (PMO) and the Operations Control Center (OCC) are set up to treat the to-go work like an outage, with status of the next week's work reviewed on a daily basis
- Use of modules — While a great idea in theory, their use so far has been a detriment to the project progress and consequently the budget
- Construction of nuclear plants today is different from the previous generation in the 1980s. It doesn't appear that all the new requirements were included in the estimate.

5.1.2 Construction Staffing

The project is heavily into the civil phase of the work, with concrete approximately 30% complete and structural steel approaching 20% complete. The piping and electrical bulk installation has just begun, with only a small amount of pipe in the turbine building being installed. The current construction staffing levels are approximately:

- Supervision — 85
- Field engineering — 290
- Direct craft — 800
- Indirect craft — 1,100

With only 800 direct craft, the supervision and field engineering ratio to craft is at present quite high. However, it is expected that when the craft staffing level peaks at approximately 4,000 (i.e., a Bechtel estimate), the ratio will be at the appropriate level if the number of non-manuals increases marginally.

5.1.3 Schedule Continues To Slip

A revised schedule was issued in January 2015, and since then the schedule has slipped significantly. The continuing problems with the modules have been a big part of the reason for the schedule slippage. Impacts from late design changes have also impacted the work. A large number of interferences have been identified and the time it takes to resolve those interferences as well as other problems such as construction errors has had a significant impact on the schedule. In addition, the concrete portion of the shield building is complex and has impacted the schedule.

There are plenty of work areas available to work, but the current staffing level will not support their needs. In an effort to improve accountability on the project, the Consortium recently introduced a Project Management Organization and an Operations Control Center. These organizations have meetings every day, and although they are improving the accountability and problem resolution, the time that the construction management personnel spend updating the issues discussed is impacting their ability to be out in the work areas. Finally, non-manual turnover is running at greater than 17%, which is impacting the morale on the project as well as the schedule.

5.1.4 Major Issues Affecting Schedule and Performance

There are a number of major issues that are having significant impacts to the schedule and the performance of the project, as described below. The Observations and Recommendations section also provides additional details.

a. Working Too Many Hours for an Extended Period

A large percentage of the personnel on the project have been working 58 hours (5-10s and 1-8 hours per week) for an extended period of time. One of the reasons given was that the overtime is used to attract the craftsmen (the project is advertised as a 48 hour work week). While overtime is used to attract crafts, the project pay scale is competitive with most non-union projects in the Southeast U.S. CB&I is presently struggling to attract rebar ironworkers and will have similar problems with pipefitters and electricians (there will be 2 to 3 times as many pipefitters and electricians as ironworkers) when the project is heavily into the bulk installation.

There are other ways to attract craftsmen besides overtime. Incentive programs have been developed, such as providing an incentive of \$1/hour for craftsmen staying until given a reduction in force, which would lower the almost 20% of craft resignations year to date. A lot of time and money is expended getting the craftsmen on board, and an incentive program like this would help retain them.

CB&I is considering increasing the amount of overtime in order to gain schedule. Numerous studies by the Construction Industry Institute, Business Roundtable, Department of Labor, and the trade unions have shown that when extended overtime is worked more than 8 to 9 weeks, the performance deteriorates quickly resulting in a 58 hour week approaching the performance

equivalent of 40 hours. The costs definitely outweigh the benefits of this approach, for in addition to reducing productivity, extended overtime also negatively affects morale, decision making, and safety.

b. Significant Non-Manual Turnover

The non-manual turnover for the last year has been greater than 17% which is high for a typical nuclear project. In particular, the Unit 2 Nuclear Island has had five different managers since the start of the project. There are a number of issues contributing to the turnover; most pressing is CB&I's difficulty in finding experienced, qualified people. While they have been hiring some of the older and experienced people who worked on nuclear power units back in the 1980s, many of these individuals are now in their 70s and this type of construction is better suited to people that can spend entire days on their feet moving from one work location to another throughout a normal work day.

Many of the non-manual personnel expressed frustration and being "worn out" due to the amount of overtime they put in to meet the job demands, as well as having to meet the informational requirements imposed by the PMO and the OCC.

Managers and supervisors working on a nuclear power plant are under constant stress. The safety, cost, and schedule concerns never cease; and when these are compounded with the frustrations of design changes, Owner demands, worker complaints, and the difficulties of achieving installation work, the stress is great, creating turnover issues.

c. Craftsmen Time at the Workface

Because of the requirements of the project, the craftsmen are not able to spend a full workday at their place of work. There are many factors involved, but the biggest one seems to be the Work Package (WP) procedures. For example, most concrete WPs include three volumes with each volume being three or more inches thick. One volume has safety bulletins, quality control signoff sheets, and general information associated with the work; one has drawings and specifications; and one has design changes. In some packages, the design change volume is twice as thick as the drawing volume.

Each day the foreman must check out the WP from document control and take it to the workface. If there had been a change to the WP in the last 24 hours, the package is put on hold until the field engineer can locate the change document in the package and replace it. If the field engineer is not available immediately, the foreman must wait to check out the WP until the field engineer is available. As a result, no work is performed until the WP is updated.

We observed the start of the work shift and it took approximately an hour for the craftsmen to start work. Further, the craftsmen leave the work area for both coffee breaks and lunch. Arrangements should be made to have the crafts stay in the building during coffee and lunch breaks.

It is a common practice to transfer craftsmen from one area to another to provide support, as needed. This is usually done on an occasional basis, after which they return to their original work location. Because of the project schedule pressure, these transfers have become standard practice, leaving some work areas (for example, the Unit 3 nuclear island) with a management team that has few craftsmen to perform the work. The present difficulty in recruiting rebar ironworkers just increases the problem. Combining Unit 2 and 3 nuclear island non-manuals might help solve some of these issues.

At this phase of construction, as elevations in the buildings are completed, there is usually space to allow the craftsmen to locate "gang boxes" and storage boxes on each elevation, so the tools needed for the work are located near the work area. Because of the ongoing module work and the small footprint of the buildings, some workers are required to carry their tools to the work area every day. If they find they need something they did not bring, they have to leave the building to get it, which is another cause of time away from the workforce.

d. Engineering Design Changes and Slow Resolution of Issues

A large part of the schedule slip is related to late design changes, slow resolution of interference issues, and the time it takes to resolve construction errors and quality problems. A large number of these issues are related to module construction. Many of the changes come at the last minute, which requires the construction group to revise their plan, which can have a significant impact on the work. In addition, changes are not being incorporated into the drawings in a timely manner, causing the craft to spend a good deal of time confirming they are working with the latest information.

When questions arise due to design interferences or an engineering analysis of a construction or quality problem is needed, it appears that either there are not enough engineering resources to address the issue, or the issue is not addressed with the urgency needed to keep schedule and cost impacts to a minimum. Apparently, there are a number of minor issues that used to be resolved by field engineering, but now require design engineering resolution. For example, each stud bent more than 15 degrees requires a design engineering resolution – this is just one example out of hundreds. Construction has developed a generic guidance document to have design engineering provide some standard procedures to address many of the minor issues. However, a review of the issues requested indicates design engineering could provide more relief to construction if more effort was spent in analyzing the issues. In addition, some of the responses construction has received seem to be much more complicated than necessary (e.g., the missing dowels from containment pour 4 which had to be drilled and grouted in). A loosening of installation tolerances would be one area that could provide construction with some significant benefits.

Construction has initiated a constructability review and a strategic planning effort which reviews the design to identify interferences and determine if there are constraints to the work. This should help drive down the number of interferences that affect work schedules.

As long as there are late design changes occurring and there is not expeditious resolution of issues that arise, there will continue to be significant schedule slippages.

e. Site Organization Impacts

The PMO meets daily in the POD meeting with site senior personnel to review near term work and review the progress (or impacts) made in the last 24 hours. The OCC meets daily with area superintendents to review the 3-week look-ahead schedule to determine progress against the schedule and identify issues that may affect it. Both of these efforts are run similarly to the method used for short term operating nuclear plant activities, such as a refueling outage or completing startup work. There are some real benefits to this approach, such as identifying what is holding up the work and determining where to focus the efforts to overcome those barriers. However, there is also a big downside to using this approach on a large construction project that is still in the civil work stage, as it causes a large number of resources to be occupied with providing daily updates instead of focusing on the work in the field.

A large project such as V.C. Summer is divided into areas, so that area teams can take full ownership of the scope handled in that area. Assistance in resolving issues (which the PMO provides) allows the team to focus on the work, but it should only focus on resolving the engineering, procurement, and quality impacts and hold schedule meetings once or twice a week. Having a daily schedule meeting which the OCC presently does, requires a lot of time and detracts from the focus required to get the construction work done. If the PMO wants to address the construction progress, they can do so in the weekly schedule meeting.

In May 2014, a management decision was made to set the CA20 module in the auxiliary building even though the module fabrication was not complete. Completion of the module is not expected until the end of this year, and doing this work in the building has had a significant impact on the cost and the schedule to the project. The module should have been left in the MAB where there is a controlled environment and access to the module is much easier using man lifts and scaffold. Had it been left in the MAB until assembly was complete, one would expect that some of the schedule slips this year would have been mitigated.

f. Changes in Current Nuclear Power Plant Construction Versus the 1980s

In the 1980s, the building boom for nuclear power plants was coming to an end. The boom had started in the 1960s, so there were many experienced craftsmen and non-manuals available, some with 20 or more years of experience. There were also numerous nuclear equipment suppliers and multiple engineering and construction organizations.

The normal practice then was to start engineering and within a few years, start construction while engineering was ongoing — usually keeping a step ahead of construction. Construction had lots of input into the design, ensuring that the project was “construction friendly”. The plants were built under the Construction Permit/Operating License approach of 10 CFR 50, so proceeding with

construction "at risk" was a common practice. Field engineering had the authority and latitude to resolve many of the issues that arose during construction.

At V.C. Summer, a standard AP1000 design is being built that is planned to be used on numerous sites. In comparison to the nuclear power plants of the 1980s, the AP1000 has reduced quantities, encompasses a smaller footprint, and uses modules extensively. However, the reality as experienced on V.C. Summer has shown some issues with this new, modernized design. The modules, while a great concept, have proven to be an impediment to the construction and are much more complicated to fabricate and install. While the quantities have been substantially reduced along with the footprint, in some areas the density of the material in the area has increased, resulting in a more difficult installation and an increase to schedule. While designing the plant in multiple locations, it appears that the coordination between those groups was inadequate in some instances. It also appears that few constructability reviews were performed, resulting in many interferences and difficulties with the construction.

Experienced craftsmen and non-manuals will continue to be hard to find. Efforts are going to have to be made to train them and find ways to make their jobs easier. The project has an extensive onsite training facility that is capable of training individuals to become most any craft. Recently, 13 laborers were trained to become rebar ironworkers where they currently have a shortage. The training program needs to be expanded and kicked into high gear to start developing pipefitters, electricians, welders, and more rebar ironworkers. WP procedures need to be reviewed to make it easier for the craftsmen to spend time at the workplace.

5.1.5 Key Schedule Challenges

a. Staffing and Productivity

A significant project challenge is obtaining the craftsmen and getting them productive. At present, the project is challenged to obtain enough rebar ironworkers and in the future, the challenge will be obtaining the large number of pipefitters and electricians in the not-too-distant future. Currently there are several areas where there is workable backlog (e.g., only 100 craft in the Unit 3 containment, several elevated floor slabs in the Unit 2 turbine building where rebar could be installed, and no work in the Unit 3 turbine building). Over the past several months, the project has been achieving a 0.5% progress per month when the Consortium's schedule requires 1%. The project needs to work the available workfaces to increase the progress. The future needs are 2.5% to 3% per month. The industrial relations group needs to get out in front with training and obtaining the craftsmen needed.

The project has several requirements of the craftsmen that keep them from the workplace, and these need to be addressed. The WPs need to be simplified in order to provide the foreman only the information required to accomplish the work and have quality control sign-offs. At present, the WPs include safety information that duplicates the weekly safety bulletins, the specifications and standard details, and too many design changes without updating the design drawings. The WPs, in some cases, are three inch binders, when the package the foreman needs is less than 1 inch

thick. The morning safety bulletin requires each member of the crew to sign the back of bulletin; it takes 15 minutes for a crew of ten to review and sign the bulletin. Thus, it takes over an hour each morning to get the crews to the workface. A senior construction person should work this issue with the goal of getting craftsmen to the workface sooner, thus becoming more productive.

The overtime, 5-10s, and 1-8 plus selective overtime needs to be reduced to no more than 4-10s and 1-8 so both craftsmen and non-manuals can be more productive. After 8 weeks of 60 hour work weeks, studies have shown that in actuality only 40 hours of work is really being produced.

b. Non-Manual Turnover

The non-manual turnover is too high to build a productive organization. There have been five different area managers in the Unit 2 containment since the project began, and all the area managers' names have changed since the first of the year except one. Reducing the overtime should reduce personnel turnover.

c. Current Forecast

A new forecast with realistic unit rates and the latest quantities needs to be developed so accurate craft staffing needs can be forecast. Once a good unit rate base is established, the craft and their superintendents need to be held accountable for weekly cost (jobhours per unit of work) performance. At present, not enough attention is given to craft performance. The indirects need to be evaluated and burn down curves developed. The ratio of 1,100 indirect craftsmen to 800 direct craftsmen is not typical.

d. Engineering Changes

Another major challenge is the amount of engineering changes due to interferences when installation is underway; these require engineering evaluations which take a good deal of time and affect craft productivity. Until this impact can be reduced, the craft productivity will continue to be impacted and the schedule will continue to slip.

5.1.6 Assessment of Project Controls Organization and Tools

A successful project controls platform requires competent team members, a project controls plan, and strong EPC integrated project management tools to track project progress and performance. It was identified over the course of the assessment that the Consortium's project controls team is competent and does have the appropriate level of experience required to manage the project. Inversely, the Owner's organization lacks the appropriate personnel to provide the proper level of review and oversight required to drive the project to successful completion.

Bechtel's assessment was focused on the schedule aspects of the project only. Cost was reviewed solely in terms of hours and productivity. In general, the project management tools that are in place to track the schedule are sufficient, but in some cases the processes and data used

require change. For example, the Consortium's bulk installation curves include both below and above ground commodities within the same curve. The bulk curve tracking tool itself is appropriate, but the results become suspect when combining these commodities. Since the underground activities occur significantly in advance of the above ground, the calculated sustained duration window is extended creating false results for evaluation of achievability.

The primary scheduling tools reviewed included the bulk installation curves, Level 1 schedule, and Primavera Level 2 & 3 schedules. Each of these items is addressed within the observation and recommendations identified in Section 5.3. In summary, these tools appear to contain the majority of procedural requirements and are deemed acceptable. The issues that exist with these tools occur within the data or level of tracking detail. Overall, the integrated project schedule contains the entire scope of the project. The issue is the appropriate level of detail contained at each level of the schedule.

- * The Level 1 schedule lacks the appropriate level of detail to be considered a useful tracking tool. It only contains some of the required dates and the overall logic sequence is not well represented, nor easily understood by the reviewer.
- * The Level 2 schedule within the Primavera tool is only a roll-up of the also included Level 3 schedule residing within. These rolled up Level 2 schedule activities, otherwise known as "hammock" activities, have a limited usefulness due to the extended durations caused by inactivity areas within a logic string. The Consortium's Level 2 schedule, which uses the before mentioned "hammock" concept, reflects the typical parallel activities which hide critical logic ties resulting in a tool with limited usefulness.
- * Unlike the Level 1 schedule, the Level 3 schedule includes a massive amount of detail. Bechtel's experience is that an appropriately sized Level 3 schedule, without the working level schedule details included, results in a more efficient and accurate tool to monitor the overall project. For V.C. Summer, the Consortium has included their Level 5 working level schedules, within the Primavera Level 3 database. This results in an overall EPC Level 3 schedule containing over 250,000 activities. Maintaining a schedule of this size takes a great amount of effort and its accuracy can be questionable. The time taken to maintain the schedule also detracts from other areas of the planning process which in most cases is more effective than the detailed schedule updates. This practice can also create a short sighted view with a loss in focus of what it takes to complete the overall project.

5.2 Analysis of the Project Construction Schedule

This section describes the process used by Bechtel to evaluate the project baseline construction schedule's most likely outcome. The current status of the project's to-date performance and percent complete by area were used as a starting point. Bechtel's past performance (21 completed nuclear units) plus four new reactor projects in the planning phase were used as predictive metrics for to-go activities. (It is noted that past nuclear power plants were constructed in accordance with 10 CFR 50 construction permits and not 10 CFR 52 combined licenses.)

5.2.1 Process Steps

The primary steps of the schedule analysis process are identified below.

1. A Level 2 baseline schedule was created from data included within the Consortium's Primavera P6 baseline file (January 2015) and the Consortium's published Level 1 summary schedule.
2. Current forecast bars were added from data included within the Consortium's P6 current forecast file (July 2015) and the Consortium's published Level 1 summary schedule with status through July 2015.
3. A baseline version of bulk commodity curves for each major facility was created from data included within the Consortium's bulk curves.
4. A new "assessment forecast" was created within the newly created Level 2 schedule based on the following:
 - Near Term Civil/Concrete – Forecast start and completion dates were identified based on walkdowns and assessments performed by Bechtel construction personnel.
 - Near Term Steel – Forecast start and completion dates were based on walkdowns and assessments performed by Bechtel construction personnel.
 - Above Ground Large Bore Piping by Area – Initially focused on placement of the 10% forecasted completion mark by area making sure to account for building predecessor logic and current forecast percent complete to-date.
 - Above Ground Small Bore Piping by Area – Set the 10% to 100% forecast dates based on Bechtel's historical relationship logic with above ground piping installation windows.
 - Cable Tray – Set the 10% to 100% forecast dates based on Bechtel's historical relationship logic with above ground piping installation windows.
 - Above Ground Conduit – Set the 10% to 100% start and completion forecast dates based on Bechtel's historical relationship logic with tray installation windows.
 - Cable – Set the 10% to 100% forecast dates based on Bechtel's historical relationship logic with above ground conduit and tray installation windows.
 - Terminations – Set the 10% to 100% forecast based on Bechtel's historical relationship logic with cable installations windows.

- Major Equipment Erection Durations – Bechtel's historical median durations were used.
5. New assessment bulk installation curves were created with the to-go installation windows set based on Bechtel's median historical sustained rates.
 6. The newly created assessment "family of curves" was compared to Bechtel's recommended model. The "family of curves" is a chart containing all of the major commodities scaled by percent complete. These commodities are then compared against each other in relationship of project percent of time. A properly sequenced project will represent itself in installation windows that follow a typical relationship. The installation windows were adjusted as necessary to account for differences as compared to Bechtel historicals.
 7. Productivity factored hours were developed based on current performance and input from Bechtel construction personnel by major account (site work, civil, piping and electrical). The newly created unit installation rates were verified against a current, equivalently-sized, Bechtel project.
 8. The commodity installation curves were converted into craft hours based on the assessed unit rates.
 9. The assessed schedule and unit rate converted hours were used to create craft manpower curves by craft type and facility.
 10. Each major facility was reviewed for peak craft loading. Schedule durations were extended where area saturation occurred.
 11. Key craft (pipefitters and electricians) unit stagger curves were created for 9, 12, 18, and 24 month staggers between units and evaluated for "best fit" and "most achievable".
 12. The assessment manpower curves were converted into percent complete curves. The planned percent complete per month values were compared to Bechtel historical references.
 13. The current Consortium's startup schedule was reviewed. The heavily concentrated "turnover and checkout" duration was increased from 12 months to 18 months to account for the following concern in the turnover system waterfall:
 - 2015: 2 turnovers
 - 2016: 44 turnovers (cumulative: 46)
 - 2017: 475 turnovers - 86% of total

(cumulative: 521 or 94% of the total BIPs)

- 2018: 33 turnovers (cumulative: 554)
- 2019: 1 turnover (cumulative: 555)

The increased duration will allow for a more balanced split between years which ultimately will create a more achievable schedule.

14. The 90% complete dates of each commodity to fuel load durations were set based on Bechtel's historical range data. This will ensure sufficient time to complete startup activities.
15. The assessment schedule logic for the "energization" activity was tied to 65% complete of terminations and the cold hydro activity was tied to 100% complete of nuclear island large bore pipe completion.
16. As a secondary verification method, Bechtel's historical durations were compared against currently forecasted durations driven by logic for the following areas:
 - Energization to start of cold hydro
 - Energization to start of integrated flush
 - Energization to start of hot functional testing
 - Start of cold hydro to fuel load
 - Fuel load to commercial operation date
17. Reconciliations for sustained rates by area, startup durations by unit, manpower peaks by craft type, percent complete by unit, and overall project duration from first concrete to commercial operation were developed.
18. A limited schedule probability assessment was performed using the Primavera Risk Analysis software. This probability assessment was used to identify the contingency value needed to increase the probability of outcome to the 75th percentile level.
 - Because of time limitations, the probability assessment was only performed on the critical path and the top 4 near critical paths.
 - A typical 1,000 iteration Monte Carlo approach was used.
 - Minimum/maximum windows were identified from Bechtel historicals and input from senior construction personnel on the assessment team.

- Minimum/maximum historical bulk installation rates were used as a secondary verification method.
- Only preferential logic was considered.
- Identification of required contingency was for assessment purposes only.

A more robust probability assessment approach would be needed before finalizing any changes to the project baseline target schedule.

5.2.2 Bases and Assumptions

The primary bases and assumptions for the schedule analysis are identified below.

1. Bechtel's historical reference data includes 21 completed nuclear units and four new reactor projects currently in the planning phase.
2. Turbine generator erection duration is based on Bechtel's average historical installation durations.
3. All activities are worked on a 48 hour work week. A second shift is assumed at 20% of overall directs.
4. During the current civil phase of the work, there are significant productivity impacts resulting from engineering and procurement issues. The impacts during the bulk installation of piping and electrical commodities are not expected to be as extensive; however, some impacts due to future engineering and procurement issues were included when developing the median case schedule.
5. Sufficient quantities and quality of craft are available to support project staffing needs up to a maximum of 3,700 craft.
6. Engineering changes will not affect material availability to support construction installation dates.
7. All modules and materials will be delivered to support construction installation dates.
8. Preventative maintenance will keep equipment operationally ready for installation.
9. The schedule has been developed to avoid craft area saturation levels by building and elevation.
10. The typical historical bulk installation sequence has been altered to account for the following:

- The north side of the auxiliary building is exclusively electrical commodities which allows for an almost parallel start with piping commodities which are primarily located in the south half.
 - The north side of the annex building is 80% electrical commodities which allows for an almost parallel start with piping commodities. The south side of the building is mixed and will follow the typical bulk installation sequence.
11. The Consortium's bulk commodity estimates by building were used for concrete, steel, large bore piping, small bore piping, cable tray, conduit, and cable with one exception. The Consortium's estimates for conduit and large bore piping in the annex building were not used and are considered unreliable. Schedule extensions to account for these high annex building quantities were not included. The Consortium is in the process of validating these quantities.
 12. The Consortium's recovery schedule for shield building installation was being finalized during the assessment and was not available for review. Because of the predicted schedule duration increases in other areas of the integrated schedule, it is assumed that the shield building will not remain on the critical path.
 13. The assembly and issuance of work packages will support the construction schedule to ensure work fronts are not limited.
 14. There are no construction equipment limitations.
 15. The indirect-to-direct craft ratio is reduced significantly from its current ratio of 1.3.
 16. ITAAC closures do not impact the critical path.
 17. Licensing issues (e.g., the need to obtain prior NRC approval of license amendments) do not limit work fronts or enter the critical path.
 18. Cyber security issues do not affect the critical path.
 19. Simulator and operator qualifications do not affect the critical path.

5.2.3 Results

The results of the schedule analysis are identified below:

- The to-go scope quantities, installation rates, productivity, and staffing levels all point to project completion later than the current forecast. Bechtel's assessment, based on certain assumptions, is that the Unit 2 and Unit 3 commercial operation dates will extend as shown in Table 5-1:

Table 5-1. Impacts on Commercial Operation Dates		
	Unit 2	Unit 3
Current COD	June 2019	June 2020
Adjustment	18 to 26 months	24 to 36 months
New COD	Dec 2020 to Aug 2021	June 2022 to June 2023

- The critical path will change from shield building installation to a more typical critical path for power plant projects that includes bulk commodity installations through overall project checkout and testing/startup.
- Increasing schedule confidence to 75% increases the schedule duration by 8 months (included in the 26 months for Unit 2 and the 36 months for Unit 3).
- The stagger between the Units 2 & 3 commercial operation dates is extended by 6 months (from the current 12 months apart to a recommended 18 months apart).
- The peak monthly construction percent complete is reduced from 3.1% to a lesser, more realistic, percentage.
- The primary checkout window is extended by 6 months (from the current 12 months per unit to a recommended 18 months per unit).
- The total craft population is increased by 25% to approximately 3,700. At peak, 850 pipefitters and 730 electricians will be required.
- The bulk installation windows are increased by a minimum of 30%.

Figure 5-1 provides the assessment Level 1 summary schedule. Both the Consortium and the Bechtel assessment schedule activities are shown for comparison. (Figures are located at the end of this section.)

Figure 5-2 through Figure 5-5 provide the mid forecast family of curves for Unit 2 total, nuclear island, turbine island, and balance of plant, respectively.

Figure 5-6 shows the Unit 2 craft manpower and percent complete curves. Figure 5-7 shows the Unit 2 head count by craft (not including subcontract hours). Figure 5-8 shows the Unit 3 craft manpower and percent complete curves.

Figure 5-9 shows the Unit 2 and 3 direct and indirect manpower curves for 12, 18, and 24 month staggers between units. Figure 5-10 shows the Unit 2 and 3 percent complete curves for 12, 18, and 24 month staggers between units.

5.3 Observations and Recommendations

Construction and project controls observations and recommendations are identified in Table 5-2.

Table 5-2. Construction and Project Controls Observations and Recommendations	
No.	Description
CPC1	<p><u>Observation(s)</u></p> <p>The MAB team has been given responsibility for completing the assembly of module CA03 for Unit 2, which was shipped to the site incomplete, because the vendor could not meet the site need date. They also have several Unit 3 module assemblies to complete and all work should be complete by Summer 2016.</p> <p><u>Recommendation(s)</u></p> <ul style="list-style-type: none"> • (Priority 1) Since the MAB has a substantial amount of work remaining in addition to the work on Unit 2 CA03, it is recommended that a resource-loaded schedule be developed and some type of plan to predict and measure performance. Since this is not typical construction work, an example might be jobhours per lineal foot of weld. The development of these tools should help keep the work on schedule and within budget. Since the shop is performing so well, a study should be performed to see what other work they can be perform as they complete module work.
CPC2	<p><u>Observation(s)</u></p> <p>The Unit 2 auxiliary building CA20 module was set in May 2014, however the fabrication and assembly was incomplete. The outstanding work was substantial and was reported to Bechtel to be as much as 50%. Seventeen months after setting the module, work continues in the field to complete the assembly. The work in the field is substantially more difficult and costly as compared to performing it in the controlled environment of the MAB, which allows easier access using man lifts which cannot be used in the field, better lighting for two shift work, and inside a building so weather is not a factor.</p> <p><u>Recommendation(s)</u></p> <ul style="list-style-type: none"> • (Priority 1) A detailed evaluation of the to-go work should be performed so that management understands the cost and schedule impacts before deciding to install something out of sequence.
CPC3	<p><u>Observation(s)</u></p> <ul style="list-style-type: none"> • An observation from the POD meetings is that the details discussed in these meetings results in micromanagement and short term planning of the specific construction activity. This type of detail management may be needed to resolve engineering (since it is in punch list mode), procurement, or quality items affecting the construction work, but for this phase of the construction, the detailed construction planning should be done by the area teams. • It was observed that approximately 30 people attend the daily POD, however less than 15 provide input. The remaining participants are there to answer any question that may come up. • Four days per week, the area supervision team spends significant time to gather information to meet with the PMO personnel to provide status of the day's progress and issues so they can be knowledgeable at the POD. This takes craft supervision out of the field, away from the craftsmen where they are needed.

Table 5-2. Construction and Project Controls Observations and Recommendations	
No.	Description
	<p><u>Recommendation(s)</u></p> <ul style="list-style-type: none"> • (Other) The focus of the POD should be on resolution of issues (i.e., engineering, procurement, and quality) impacting the construction activities. The area construction teams should develop the three week look-ahead schedule and monitor the plan in the area construction meeting, which should not be held more than twice per week. The reason a project of this size is broken down into areas is because it is too big to manage construction from a central group (for example, a PMO). Delegate to the area team the responsibility for cost and schedule. The PMO should provide support to resolve engineering, procurement, and quality issues as needed and integrate all facets of the project.
CPC4	<p><u>Observation(s)</u></p> <p>The field material requisition process is time consuming, resulting in delays in schedule and impacts to productivity. There are nine (9) people who sign off on field requisitions and if one requires changes, the process stops, the changes are made, and the process starts all over again. Several superintendents have indicated that this process applies to all material including construction aids and construction materials.</p> <p><u>Recommendation(s)</u></p> <ul style="list-style-type: none"> • (Other) Look at streamlining the process for construction aids and material. In addition, look at expanding the min/max program to ensure enough material is continuously maintained to adequately support construction. This would cover items such as stock steel (angles, channels, etc.), fasteners (bolts, nuts, washers, etc.), piping material (studs, gaskets, etc.) and conduit fittings and unistrut.
CPC5	<p><u>Observation(s)</u></p> <p>A review of the reading room documents suggests that the budgeted unit rates may not have been estimated and resource-loaded to account for differing locations and complexity. As an example, the budgeted unit rate of 35 to 36 jobhours per ton for rebar installation is used for standard as well as complex installations. The turbine pedestal, elevated slabs, and wall rebar installations require higher unit rates than a base mat installation. Craft productivity against the as budgeted unit rates has been difficult to achieve to date. This results in poor morale and an unmotivated effort to measure craft productivity.</p> <p><u>Recommendation(s)</u></p> <ul style="list-style-type: none"> • (Priority 1) The project should complete a reforecast based on to date performance, and establish realistic unit rates for the bulk installations. These realistic unit rates times the forecasted quantities will result in better projections of manpower needs by craft needs and craft performance can be monitored. • (Priority 1) Adjust the rates to take into account present performance impacts such as: work packaging, skill levels, experience of personnel, and 10 CFR 52 licensing requirements.
CPC6	<p><u>Observation(s)</u></p> <ul style="list-style-type: none"> • The current status of piping deliveries to each unit are as follows: <ul style="list-style-type: none"> — Unit 2: 82% B31.1 is at site; 56% ASME is at site — Unit 3: 63% B31.1 is at site; 28% ASME is at site • It was stated that 20% to 30% of delivered spools at the site require rework due to changes which include revisions due to valve lengths changes, equipment nozzle relocations, etc.

Table 5-2. Construction and Project Controls Observations and Recommendations	
No.	Description
	<p>WEC's Engineering Manager explained that the majority of the changes were due to movement of hangers on the piping isometrics, not physical changes to the pipe.</p> <p><u>Recommendation(s)</u></p> <ul style="list-style-type: none"> • (Other) The project needs to determine how much rework is required on the delivered pipe spools and get it done prior to delivery to the installation point.
CPC7	<p><u>Observation(s)</u></p> <p>Indirect labor and materials are a major cost to the project. Presently there are more crafts working indirect (1,100) than direct (800) work. Normally on a project at this stage, indirect costs should be about 30% of direct costs. The addition of an Indirects Manager three (3) months ago is a good addition to the team. This manager will provide visibility to indirect charges so management can make the appropriate changes and reduce the costs. Additionally, a review of the construction equipment plan shows a large part of the construction equipment demobilizing next year, which appears to be too early based on progress to date.</p> <p><u>Recommendation(s)</u></p> <ul style="list-style-type: none"> • (Priority 2) The project should develop a craft staffing plan to reduce the indirect costs and staffing to a reasonable level. It should be monitored weekly just like direct work. A reforecast should also be performed along with a revised equipment plan.
CPC8	<p><u>Observation(s)</u></p> <p>A comparison between CB&I non-manual organizational charts issued 7 months apart revealed significant non-manual turnover. The turnover included several key areas such as the Unit 2 Nuclear Island Construction Manager (this is the fifth manager since the project began), MAB Area Construction Manager, Turbine Building Area Construction Manager, as well as non-manual personnel reporting to area managers. The reported turnover of non-manual is greater than 17%. With such a high turnover rate it will be difficult to build a productive non-manual organization.</p> <p><u>Recommendation(s)</u></p> <ul style="list-style-type: none"> • (Priority 1) Perform an evaluation of why the turnover in non-manuals is so high. Areas to investigate would include the demand to work excessive overtime, conflicting management direction, or the micromanagement of personnel. The resolution of some of these potential issues would help reduce the turnover of the non-manual workforce.
CPC9	<p><u>Observation(s)</u></p> <p>There were 21 rebar dowels left out of Lift 4 of Unit 2 containment slab placement. Engineering required that the dowels be replaced by core drilling and grouting in the dowel rebar. The resolution of the issue and the completion of the work caused weeks of delays to the containment work and possibly the project. Numerous personnel have cast doubt on whether these dowels really needed to be grouted in; i.e., dowel bars with 90 degree or 180 degree hooks could possibly have been used to obtain the required bar development length without core drilling and grouting.</p> <p><u>Recommendation(s)</u></p> <ul style="list-style-type: none"> • (Other) A dedicated team of senior subject matter experts from both WEC and CB&I engineers should be engaged to review these types of situations to ensure that the proposed fix, which will have a significant impact on schedule, is really required. In addition, this team should assist

Table 5-2. Construction and Project Controls Observations and Recommendations	
No.	Description
	with resolution of critical issues from the time of discovery of the issue to ensure it is resolved with as small an impact to the project as possible.
CPC10	<p><u>Observation(s)</u></p> <ul style="list-style-type: none"> The project has had difficulty hiring skilled craftsmen, especially rebar ironworkers. When the project reaches peak staffing the need for pipefitters, welders, and electricians will increase substantially. It is estimated that this project will need in excess of 900 pipefitters and 700 electricians. Bechtel visited the onsite training facility and were impressed with the capabilities. The Consortium had just trained 13 rebar ironworkers which was immediately helpful to the project and this type of "immediately needed training" needs to be expanded. A project-specific labor survey had not been recently performed. <p><u>Recommendation(s)</u></p> <ul style="list-style-type: none"> (Priority 2) In addition to onsite training, CB&I should consider establishing a training school off site (possibly at local vocational schools) to train pipefitters, electricians, and welders to insure they can fill their needs in a timely manner. (Priority 2) There are 6 onsite classrooms available which should be used full time to develop those crafts that are presently or will be in short supply. (Priority 2) A project-specific labor survey should be performed.
CPC11	<p><u>Observation(s)</u></p> <p>Aging of the construction workforce is impacting productivity.</p> <p><u>Recommendation(s)</u></p> <ul style="list-style-type: none"> (Priority 2) Develop mentoring and training plan to promote junior craft and field engineering personnel with periodic evaluations and feedback sessions. (Priority 2) Create and staff shadow positions for senior level positions within the Consortium intent on developing new talent that is focused on project completion.
CPC12	<p><u>Observation(s)</u></p> <p>The concrete being used is self-consolidating and does not need vibrating. However, in a number of areas, mostly where there is dense rebar, voids in the concrete were evident.</p> <p><u>Recommendation(s)</u></p> <ul style="list-style-type: none"> (Other) In areas of dense rebar, additional consolidation such as standard concrete vibrating or form vibrating should be used to ensure complete consolidation of the concrete.
CPC13	<p><u>Observation(s)</u></p> <ul style="list-style-type: none"> Presently, some parts of the project are working 58 hours (5-10s and 1-8 hours). Studies by the Business Roundtable, Construction Industry Institute, and Trade Unions have been done to assess the impact of working extended overtime. They have shown that after eight (8) weeks, the productivity drops by approximately 40%, which means that you would be getting 40 hours of work for 58 hours pay. Extended overtime also has an effect on absenteeism, accidents, physical and mental fatigue, morale, attitude, turnover and supervision decisions. The schedule also suffers, which adds more pressure to work overtime.

Table 5-2. Construction and Project Controls Observations and Recommendations	
No.	Description
	<ul style="list-style-type: none"> In discussions with CB&I Industrial Relations, it was stated that when the recruiters hire craft personnel, they are told the project is on 4-10s and 8. A general feeling is that the project would maintain the work force if the 6 day weeks were stopped. The craft turnover rate is 20%. CB&I is expending a lot of money to hire and orient craftsmen. <p><u>Recommendation(s)</u></p> <ul style="list-style-type: none"> (Priority 1) The work week should be reduced to no more than 48 hours (4-10s and 1-8 hours). With the monies saved not working as much overtime, consideration should be given to a craft incentive plan that rewards staying on the project until given a reduction in force, and/or productive and safety incentive. (Priority 1) To reduce the turnover, CB&I should consider a craft incentive of \$1/hr which would only be paid when a reduction in force occurs.
CPC14	<p><u>Observation(s)</u></p> <p>There are occasions where the construction team is too optimistic when scheduling work.</p> <p><u>Recommendation(s)</u></p> <ul style="list-style-type: none"> (Priority 2) Work activities should be planned based on a realistic evaluation of the work, rather than optimistic projections due to schedule pressure from management. This way, craftsmen will be working productively. The project should consider a rule that the placement must be signed-off, except for final clean up, the day before the placement
CPC15	<p><u>Observation(s)</u></p> <p>Although the construction team is being pushed hard to maintain schedule, the project schedule continues to slip for a variety of reasons, including design changes and clarifications. As a consequence of the focus on schedule, the cost does not receive the attention it should. The craftsmen do not focus on productivity as they should due to the schedule changes over which they have only partial control. The outcome of this will be an extended schedule and a cost overrun.</p> <p><u>Recommendation(s)</u></p> <ul style="list-style-type: none"> (Priority 2) Maintain the schedule focus, but not at the expense of project cost. When engineering issues arise, adjust the schedule accordingly, so the craftsmen still feel they have some control and responsibility for working the schedule within budget.
CPC16	<p><u>Observation(s)</u></p> <p>During walkdowns of the Unit 2 turbine building and the Unit 3 nuclear island, it was noticed that there were numerous work faces available, but no work was underway. The Unit 3 containment had only approximately 100 craft working. When this was questioned, both superintendents stated that craft personnel had been moved to the Unit 2 nuclear island as it was more important.</p> <p><u>Recommendation(s)</u></p> <ul style="list-style-type: none"> (Priority 1) Staff up to allow working of all available work areas. Leave craftsmen assigned to one area so they feel they are part of an area team. It may be appropriate to combine the Unit 2 and Unit 3 containment to better use non-manuals and make some personnel available to fill other project needs. This would allow better incorporation of lessons learned by both non-manuals and craftsmen in Unit 2 to improve Unit 3 performance and schedule.

Table 5-2. Construction and Project Controls Observations and Recommendations	
No.	Description
CPC17	<p><u>Observation(s)</u></p> <ul style="list-style-type: none"> The superintendent provided drawings of the raceway and hangers in the containment which showed congested areas. From looking at the drawings it is evident that there will be numerous interferences. Additionally, the electrical hangers are much more complex than normal electrical hangers. In the containment, hangers are located by plant latitude and longitude. Locating these will require a survey crew rather than allowing the craftsmen to do it. <p><u>Recommendation(s)</u></p> <ul style="list-style-type: none"> (Priority 1) An interference review should be performed and any interference found should be resolved prior to start of installation. Some estimates should be performed to determine whether it is cheaper to install the hanger as designed or redesign the hanger. Once a decision is made, a reforecast should be performed to determine what the real costs would be. (Priority 1) Hanger locations need to be located on the drawing using reference lines in the containment.
CPC18	<p><u>Observation(s)</u></p> <p>Based on discussions with supervision and field engineering and attending the PMO meetings, it is apparent that there are numerous design changes and design clarifications that affect the work resulting in negative impacts to the schedule of the work. The majority of these are in the civil discipline. One would expect similar issues in piping mechanical and electrical.</p> <p><u>Recommendation(s)</u></p> <ul style="list-style-type: none"> (Priority 1) Ensure that the design organization recognizes the importance of design changes and clarifications and is staffed to address them immediately. The negative impacts to the project will not decrease as long as changes continue and clarifications are slow to come from engineering and will continue throughout the project unless a change is made.
CPC19	<p><u>Observation(s)</u></p> <p>The present staffing curves for manual manpower are classic bell shaped curves. Based on Bechtel's experience, the manual manpower curve will increase towards the latter part of the project and then drop off sharply at the end of the project. In addition, there are no crafts shown on the chart nine (9) months prior to commercial operation to close out punch list items.</p> <p><u>Recommendation(s)</u></p> <ul style="list-style-type: none"> (Other) Re-evaluate the staffing levels based on historical data and ensure there are crafts budgeted for punchlist completion.
CPC20	<p><u>Observation(s)</u></p> <p>Installation tolerances are provided for all commodities and may not be exceeded without prior engineering approval. CB&I construction has attempted to relax the requirements and documented their requests in the civil generic guidance document. There are numerous situations where the commodity cannot be installed because of design interferences. As each situation arises, progress is affected while engineering evaluates the situation. The Strategic Planning Group is trying to identify these interferences, but they are not able to identify all of them.</p>

Table 5-2. Construction and Project Controls Observations and Recommendations	
No.	Description
	<p><u>Recommendation(s)</u></p> <ul style="list-style-type: none"> • (Priority 1) Assemble a team of subject matter experts who can meet with field engineering to identify those areas where tolerance increases would help solve installation and interference problems. Examples would include increasing rebar spacing tolerances, increasing pipe location tolerances, etc.
CPC21	<p><u>Observation(s)</u></p> <p>The project team has a robust safety program which has achieved some impressive results. The safety package handed out at the weekly safety meeting contained a one page tailgate topic for each day of the week. Some of the tailgate write-ups are overly detailed and contain a substantial amount of information, which might be hard to understand and retain.</p> <p><u>Recommendation(s)</u></p> <ul style="list-style-type: none"> • (Priority 1) Keep up the good work! The safety department might consider simplifying the tailgate write-up so it could be easier to understand and retain. (For example, the September 25, 2015 tailgate topic on chemical labeling was perhaps too complex.) • (Priority 1) At the daily morning safety briefing, each craftsman is required to sign the morning bulletin. This probably takes 15 minutes for the crew to sign the bulletin which is 15 minutes the craft is not at the work face. The need for signatures should be re-evaluated.
CPC22	<p><u>Observation(s)</u></p> <ul style="list-style-type: none"> • The current work package procedure requires the craft foreman (or his designee) to check out the work package each morning and return it to document control each night. If changes have occurred in the last 24 hours it is on hold until field engineering updates it. The work packages must be at the work face during work activities. Some work packages are hundreds of pages long and they contain all related drawings, drawing changes and specifications. A significant amount of time is lost each day implementing the work package process. • Some work packages contain three volumes, some of them over three inches thick. The foreman only needs a small amount of this paperwork to perform his daily tasks. <p><u>Recommendation(s)</u></p> <ul style="list-style-type: none"> • (Priority 1) Assign a team to review and streamline the work package process. One change might be having the responsible field engineer hold the work package and only issue the relevant drawings (and changes) and inspection, hold points, and signoff sheets to the foreman. • (Priority 1) At a minimum, incorporate the design changes into the construction drawings before the craft start work. (It is time consuming for the foreman to refer to multiply design change documents when trying to execute the work). Remove the specifications and standard details from the packages given the foreman, they can be referenced and copies kept in the field stick file trailers. The work packages should only include what is needed by the foreman for their work.
CPC23	<p><u>Observation(s)</u></p> <p>Normally, the bulk commodity installation curves are somewhat parallel with the civil work in advance of the piping which is in advance of the electrical work. On the V.C. Summer project, the curves do not parallel each other with some electrical work crossing piping. The time between commodity installations does not appear sufficient to allow installation of bulks in an efficient manner.</p>

Table 5-2: Construction and Project Controls Observations and Recommendations	
No.	Description
	<p><u>Recommendation(s)</u></p> <ul style="list-style-type: none"> • (Priority 2) Adjust the schedule for the bulk installation of commodities to allow enough time between work activities to achieve an efficient and cost effective installation program.
CPC24	<p><u>Observation(s)</u></p> <ul style="list-style-type: none"> • The monthly progress report shows construction progress advancing approximately 0.5% per month with a total to date (August 2015) of 21% complete. In order for the plant to complete on schedule, monthly construction progress must increase to close to 3%. There are several work faces without craftsmen, (examples: Unit 2 turbine building elevated slabs; the Unit 3 containment only had 100 men working, and no work in the Unit 3 turbine building.) • It takes approximately one hour before the craftsmen get to their workplace. At both of the coffee breaks and lunch time, the craftsmen leave the work area resulting in unproductive time leaving and returning to work. <p><u>Recommendation(s)</u></p> <ul style="list-style-type: none"> • (Priority 1) The project needs to staff up to work all available work faces. • (Priority 1) Assign a senior construction person to evaluate methods to have the craftsmen spend more time at the workface (One example: move the tool boxes into the building near the work area.) • (Other) Have coffee breaks and lunch in the work areas.
CPC25	<p><u>Observation(s)</u></p> <p>The Consortium's Integrated Project Schedule has 50 mandatory constraints—20 associated with Unit 2, 24 associated with Unit 3, and six site-specific.</p> <ul style="list-style-type: none"> • A majority of the mandatory constraints affect fabrication of shield building panels that are forecast for later deliveries from the fabricator, the latest being for Unit 2 149'-6" transition panels currently forecast to be complete 9 months later than the constrained date. The Consortium stated during the September 9, 2015 presentation that a mitigation plan is in process for the shield building panels. • There is a constraint on the Unit 2 auxiliary building R251 module that is currently forecasted to be complete 5 months later than the constrained date. • There is a constraint on the Unit 3 CA01 module ready to lift that is currently forecasted to complete 4 months later than the constrained date. • There is a constraint on the Unit 3 CA20 module ready to lift that is currently forecasted to complete 4 months later than the constrained date. <p><u>Recommendation(s)</u></p> <ul style="list-style-type: none"> • (Priority 1) Remove mandatory constraints, and allow the schedule to move based on the logic. Prioritize development of mitigation/recovery plans based on their potential impact to the schedule. Only incorporate mitigation plan recovery into the schedule after it has been fully developed and approved by all parties.
CPC26	<p><u>Observation(s)</u></p> <p>The baseline forecast was developed based on a performance factor of 1.15. Recent (last 6 months) performance has been greater than 2.0 on Unit 2, and greater than 1.5 on Unit 3, primarily driven by civil building construction impacts.</p>

Table 5-2. Construction and Project Controls Observations and Recommendations	
No.	Description
	<p><u>Recommendation(s)</u></p> <ul style="list-style-type: none"> • (Priority 2) Update the forecast based on recent performance. Reassess manpower needs based on updated forecast. • (Priority 1) Implement a small sample of piping and electrical work packages well ahead of bulk installation period to assess potential impacts early. • (Priority 1) Plan to ramp-up slowly, gradually, to achieve an acceptable productivity level, train leads, and identify challenges and impediments prior to ramping up to full bulk installation mode.
CPC27	<p><u>Observation(s)</u></p> <p>The Owners' oversight organization does not have a proper Project Controls staff.</p> <p><u>Recommendation(s)</u></p> <ul style="list-style-type: none"> • (Priority 1) Hire an experienced project controls manager, lead planner, and lead cost engineer to perform analysis of the Consortium schedule and cost forecasts. • (Priority 1) A separate set of tracking tools should be created by the Owner to provide verification of Consortium reporting. • (Other) Special attention needs to be made on the cost reimbursable portions of the scope. This newly formed Project Controls group would provide recommendations and identify areas requiring additional investigations.
CPC28	<p><u>Observation(s)</u></p> <p>Consortium reports are provided in either a summary form or in an integrated manner making validation difficult.</p> <p><u>Recommendation(s)</u></p> <ul style="list-style-type: none"> • (Priority 1) Where contractually possible, the Owners should request the data that creates the reports not just the reports. The recommended Project Controls team would then analyze the data rather than just reviewing the report.
CPC29	<p><u>Observation(s)</u></p> <p>The Consortium has narrowed focus into individual windows with a total horizon of around 9 months. The project reporting has followed suit and a majority of the reports provided focus upon this short time horizon. The reports to the Owners need to continue to be overall project focused.</p> <p><u>Recommendation(s)</u></p> <ul style="list-style-type: none"> • (Priority 2) Request all reports provided by the Consortium for the monthly meetings contain the overall view regardless of topic. Breakouts are acceptable and sometimes needed, but overall focus must remain on the overall project performance.
CPC30	<p><u>Observation(s)</u></p> <p>Not all reports and/or graphical representations provided within reports include the baseline and/or the Consortium's current forecast.</p> <p><u>Recommendation(s)</u></p> <ul style="list-style-type: none"> • (Priority 1) Request all reports provided to the Owners include both baseline information and a current forecast if different than the baseline. If the current forecast is later than the baseline,

Table 5-2. Construction and Project Controls Observations and Recommendations	
No.	Description
	the Consortium should provide a recovery forecast plan. If cost is being discussed and the cost forecast exceeds the baseline, an estimate at completion should be required.
CPC31	<p><u>Observation(s)</u> Bechtel was told that the contract contains a portion of fixed price and cost reimbursable terms. The charging practice, if not tracked closely, could allow for improper cross charging between accounts.</p> <p><u>Recommendation(s)</u></p> <ul style="list-style-type: none"> • (Priority 1) Request staffing plans by position which account for the total project baseline budget for the tracking of jobhours. For the tracking of material type budgets, such as equipment or small tools, a baseline monthly usage plan should also be submitted for baseline tracking purposes. This document would serve as the basis for future negotiations and would provide enough detail for scope increase discussions and also validation of current actual charges.
CPC32	<p><u>Observation(s)</u> Schedule contingency has not been included within the integrated schedule.</p> <p><u>Recommendation(s)</u></p> <ul style="list-style-type: none"> • (Priority 2) Analyze the schedule to identify activities within the critical and near critical paths that contain potential float. At the time of rebaselining the schedule, a schedule contingency analysis should be run and the desired probability of outcome should be agreed on.
CPC33	<p><u>Observation(s)</u> In reviewing the bulk piping curves, it was identified that the underground and aboveground commodities were included within the same chart. Tracking these together can be misleading especially when validating the sustained rates to ensure an achievable plan.</p> <p><u>Recommendation(s)</u></p> <ul style="list-style-type: none"> • (Priority 2) Separate the curves and track all underground quantities separate from above-ground quantities. Also, after creating separated curves, compare the current installation plan to historicals to validate their viability.
CPC34	<p><u>Observation(s)</u> While reviewing the bulk curves, it was identified that the bulk curves were not developed through the use of standard "S" shape curves. The "S" curves were altered to allow for additional time between the 10% and 90% completion windows to lower the sustained rates. This artificial increase in the sustained rate window reduces the sustained rate for comparison purposes but does not alter the real installation pace required to meet the plan.</p> <p><u>Recommendation(s)</u></p> <ul style="list-style-type: none"> • (Other) Only use a standard "S" shaped work-off curve when evaluating the schedule duration viability.
CPC35	<p><u>Observation(s)</u> Bulk quantity installation curves reflect an overly aggressive plan when compared to Bechtel historical experience of peak sustained installation rates. Also, the separation of each commodity within the "family of curves" is not reflective of Bechtel historical experience. An example of this is</p>

Table 5-2: Construction and Project Controls Observations and Recommendations	
No.	Description
	<p>the distance between the raceway and cable percent complete curves. The cable installation percent complete follows closely to the raceway installation percent complete. Historically, the more achievable plan reflects that a substantial portion of the installation of tray and conduit is complete prior to the commencement of cable pulling. This separation allows for pulls from point to point without having to coil at each end. Having to coil the cable rather than pulling to its final location creates additional hours due to double handling.</p> <p><u>Recommendation(s)</u></p> <ul style="list-style-type: none"> • (Priority 1) Create a new, more achievable, baseline Level 3 schedule. During development of the schedule, ensure appropriate time is allocated for bulk installation windows. • (Priority 1) Update the schedule forecast based on the median range of achievable peak sustained rates. • (Priority 1) Review quantities by system, and align to the schedule and start-up system waterfall. Prioritize bulks by system turnover demands. Balance this priority with area releases, and methods that would allow the highest productivity to be achieved. Compare system driven quantity curve against peak sustained rate forecast, and adjust accordingly. • (Priority 1) Plan work packages around the most productive methods of bulk installation (e.g., cable trees), with consideration for ability to support system turnovers.
CPC36	<p><u>Observation(s)</u></p> <ul style="list-style-type: none"> • During the review and analysis of the quantities provided by the Consortium, it was identified that the total quantity of aboveground conduit appears to be high compared to Bechtel historicals. • Inversely, the total quantity for cable appears to be low. These quantities were also reviewed from a ratio perspective and result in an overall ratio unlike any of Bechtel's past projects. <p><u>Recommendation(s)</u></p> <ul style="list-style-type: none"> • (Priority 1) Review the electrical quantities in the annex building and turbine building and update as needed. Revise the Level 2 and 3 schedules and also the bulk curves to align with the account for the new quantities.
CPC37	<p><u>Observation(s)</u></p> <ul style="list-style-type: none"> • The consortium project schedule is large and complex, forcing daily maintenance and status updates. Varying levels of the schedule are comingled in the same projects, and are loaded with varying degrees of resource data, resulting in duplication • The Level 1 schedule (as presented in the monthly project review meeting package) effectively highlights the critical path and major project activities on a single page. However, dates are only included for certain activities and a timescale is not provided, therefore target and forecast dates for other major activities are not clear. The schedule also appears to start in January 2015, showing no status of actual work completed prior to that date. • The Level 2 schedule is made up of "WBS summary" (work breakdown structure) type activities which are essentially hammock activities for all detailed activities within that WBS. This schedule provides a summary by unit, building, elevation, and commodity, and is fully resource loaded with jobhours through project completion. The Level 2 schedule appears to have many activities working in parallel, which isn't necessarily the case. When viewed at a lower level of detail, the Level 2 hammock (summary) activities capture all activities from fabrication through

Table 5-2. Construction and Project Controls Observations and Recommendations	
No.	Description
	<p>punch list and touch-up activities. In many cases, fabrication begins several months or more prior to installation, and there are also large gaps between bulk installation and final completion activities within a WBS (work breakdown structure). This approach skews the Level 2 activities into much longer durations than when the bulk of the work is actually planned to be performed. Furthermore, as the Level 2 schedule is fully resource loaded, this approach is spreading those resources over a longer period of time, reducing the resulting peak manpower requirements. This can be problematic if the Level 2 schedule is the primary tool being utilized to determine manpower requirements.</p> <ul style="list-style-type: none"> The Level 3 schedule is the detailed working level schedule for the project. Development of this schedule is ongoing, and is currently being reviewed at 6 to 9 month durations beyond the data date. Due to the level of detail and number of activities in this schedule, this schedule is considered to be a Level 5 implementation schedule. Resources are being loaded in this schedule as well as some quantities, but do not appear to be complete enough to be used for forecasting purposes. The Consortium's project controls group is performing daily reviews of this schedule due to its large size and complexity, and the volume of changes being input on a day-to-day basis. The team has established a good process for managing the existing schedule, but daily updating and reviews are excessive for this size and scope of project. <p><u>Recommendation(s)</u></p> <ul style="list-style-type: none"> (Priority 2) Adjust the Level 1 schedule to include a time-scaled baseline and target and forecast dates for all identified activities. Expand the start of the window schedule to show major project status since project inception. (Priority 1) Create a Level 3 control schedule with no more than 5,000 activities per unit. The Level 2 schedule can be used at a starting point, but would need to be converted to "task" activities as opposed to "hammock activities". The Level 3 schedule should be at a sufficient level of detail to identify all critical interfaces between each phase of the project. The recommended structure is to identify construction activities by unit, building, elevation, area, and commodity. A custom data field should be added to identify systems associated with each activity, to ensure proper tie in from construction to startup. This schedule should be resource loaded with key quantities and job hours and maintained/aligned to the current forecast for the project. Weekly meeting and management reviews should use this Level 3 schedule as opposed to lower level schedules. (Other) Develop more detailed Level 5 implementation schedules as needed to manage near term commitments for critical areas. These can be in Excel rather than Primavera, and in addition to time-scaled format, can be in the form of a bingo-sheet, checklist, or other method to track status. Primavera is currently over-used for this level of the schedule, demanding more maintenance, update, meetings, etc., that strain project resources.

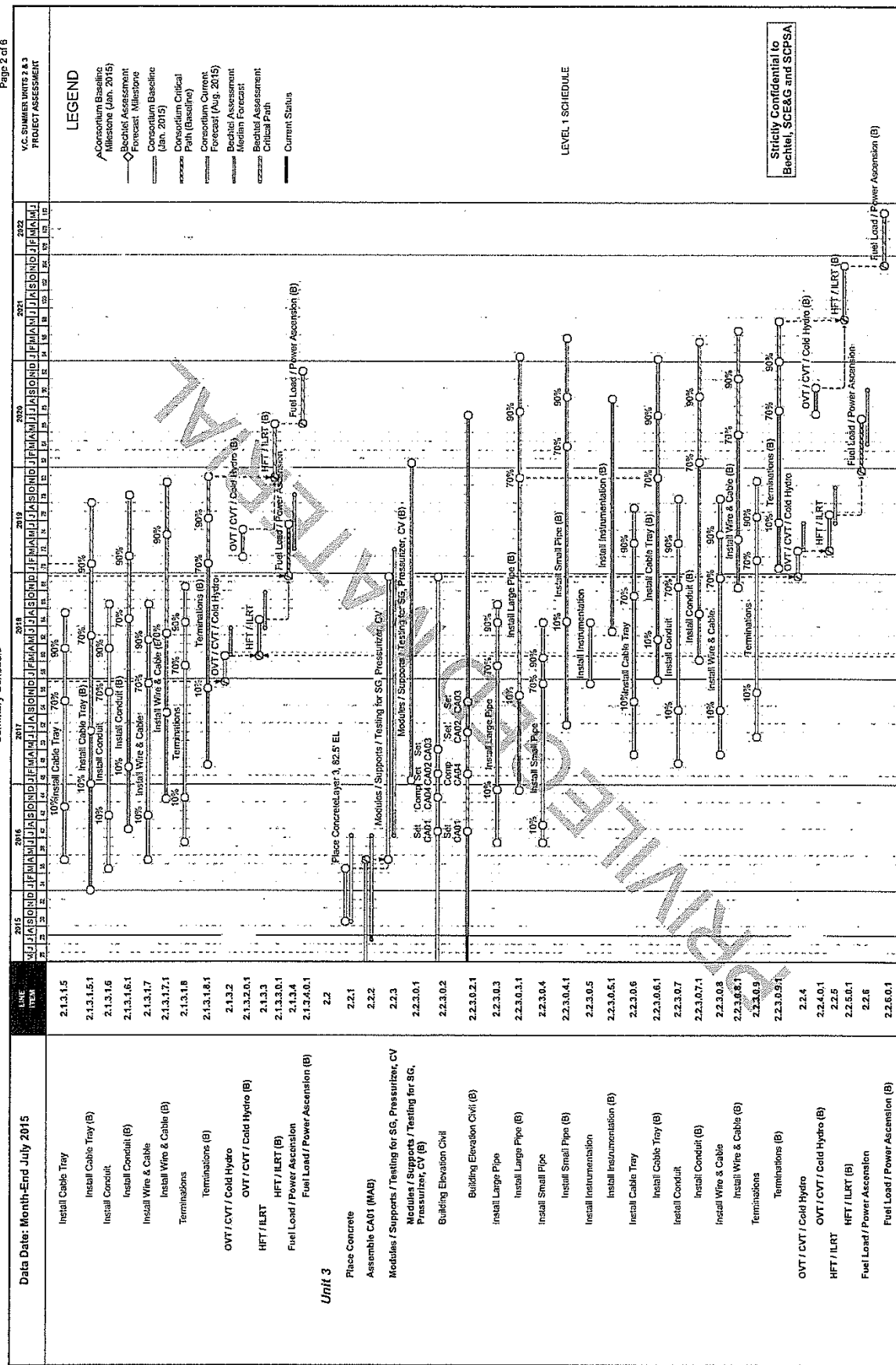
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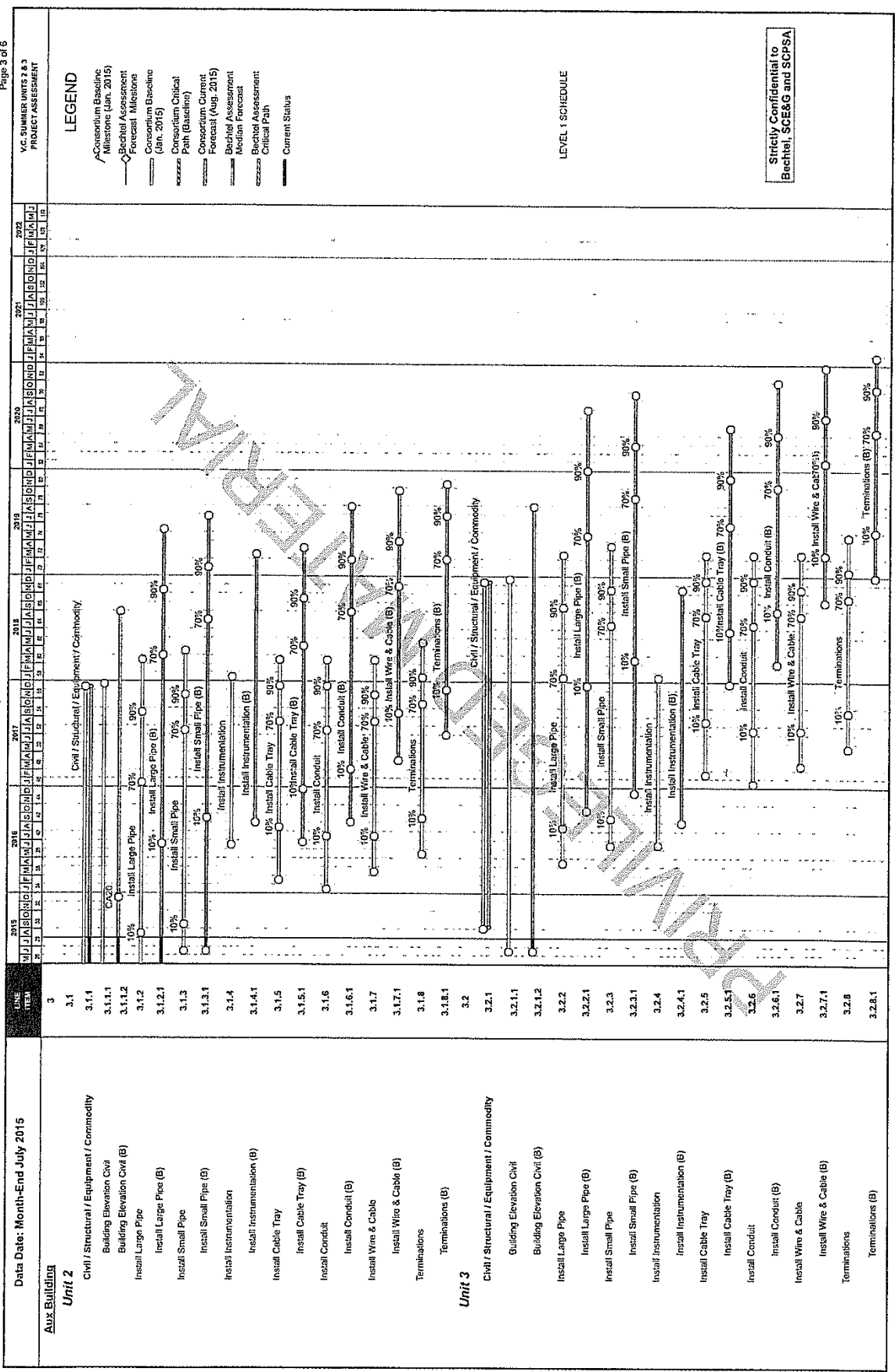
Figure 5-1 V.C. Summer Units 2 & 3 Project Assessment
Summary Schedule



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Figure 5-1. V.C. Summer Units 2 & 3 Project Assessment
Summary Schedule



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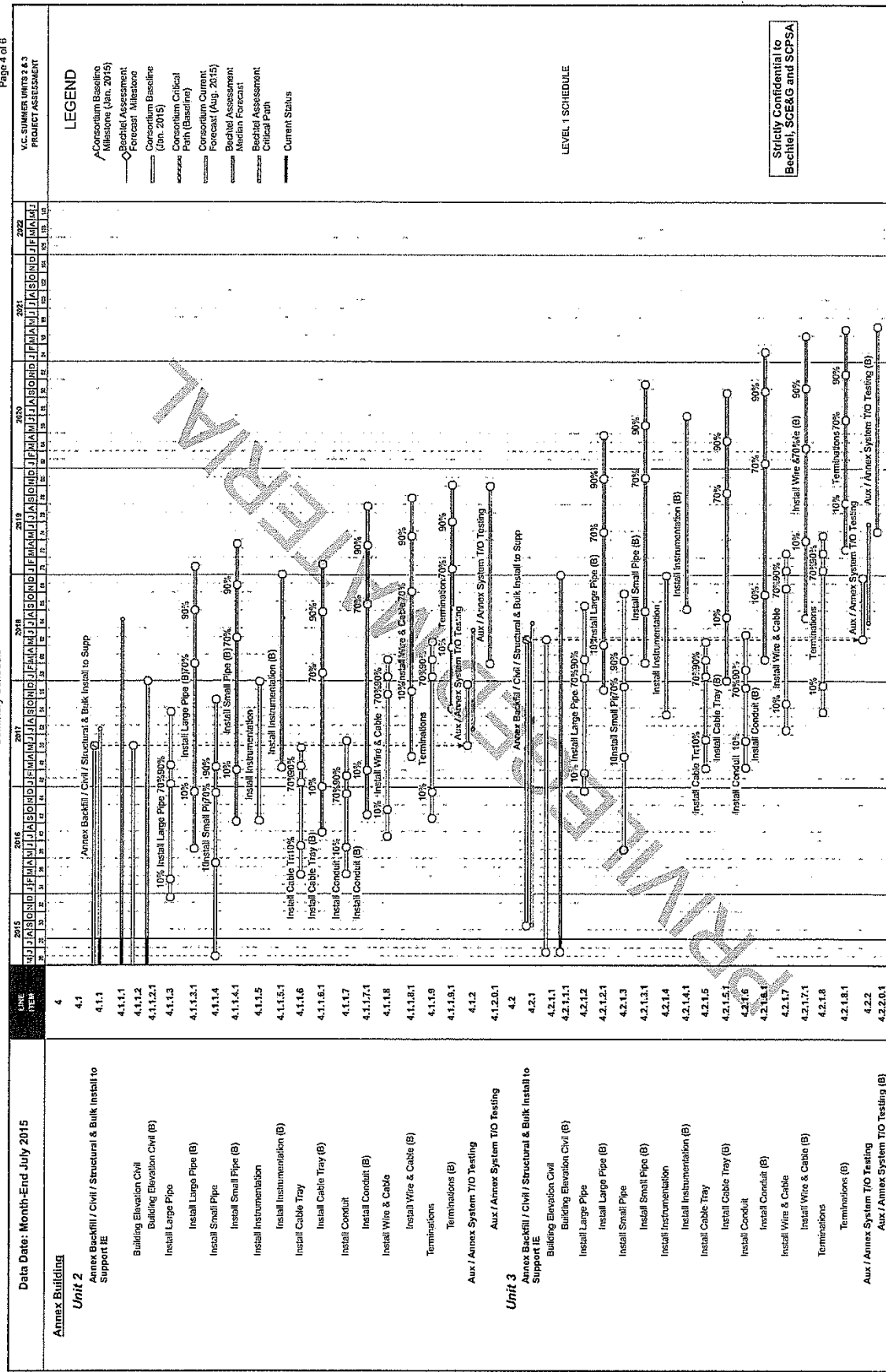
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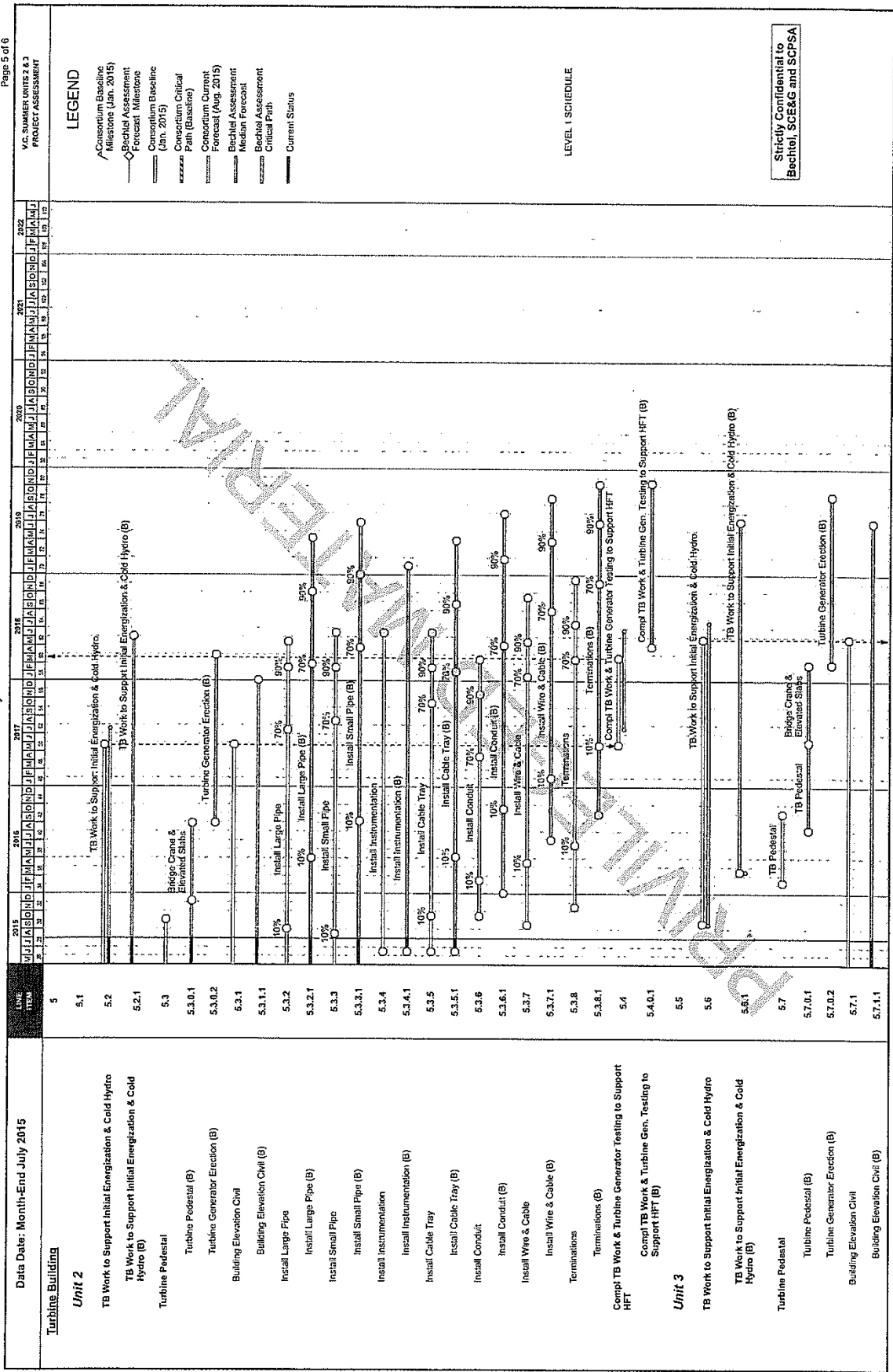
Figure 5-1. V.C. Summer Units 2 & 3 Project Assessment
Summary Schedule



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Figure 5-1. V.C. Summer Units 2 & 3 Project Assessment
Summary Schedule

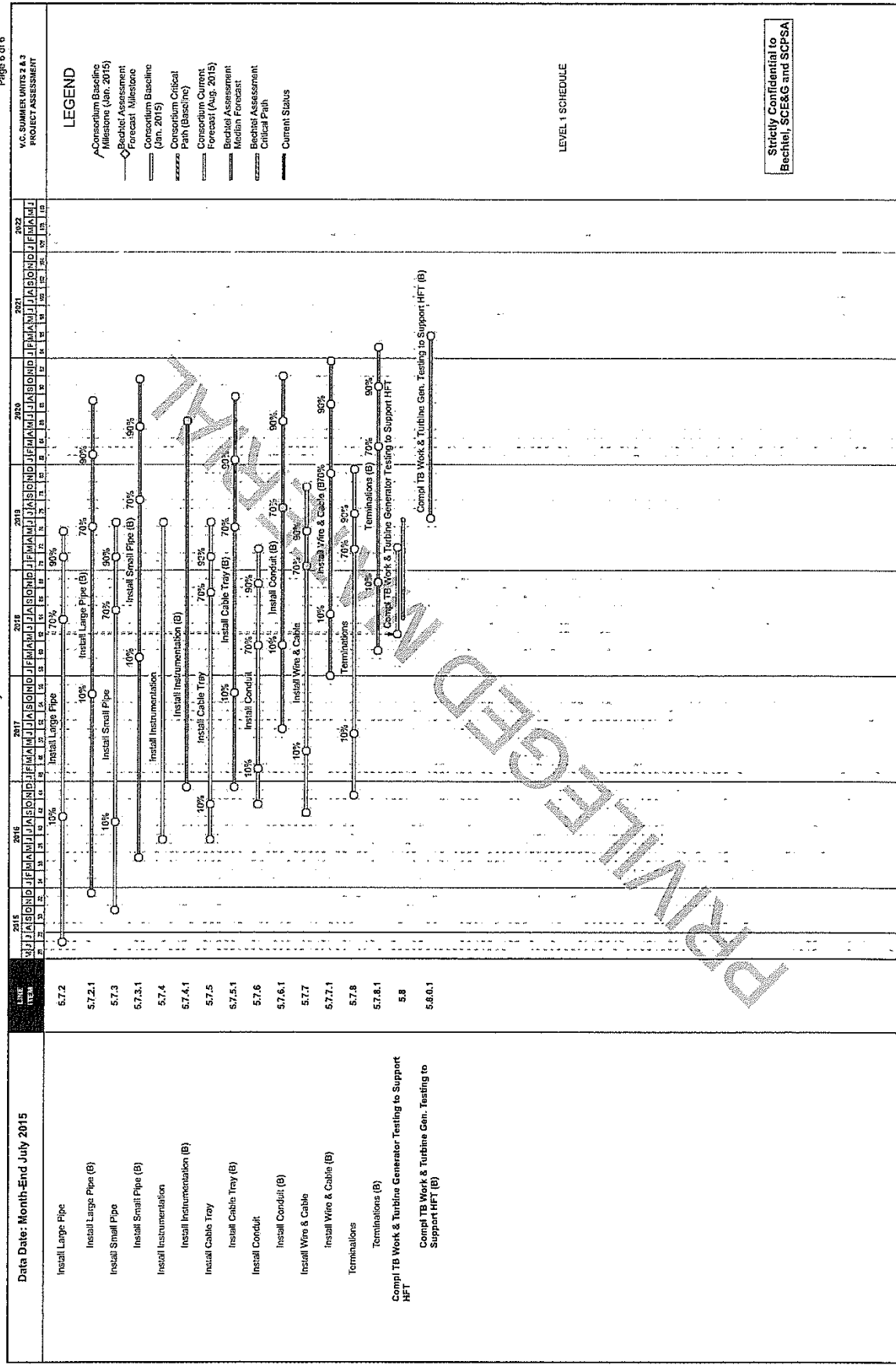


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Figure 5-1: V.C. Summer Units 2 & 3 Project Assessment
Summary Schedule



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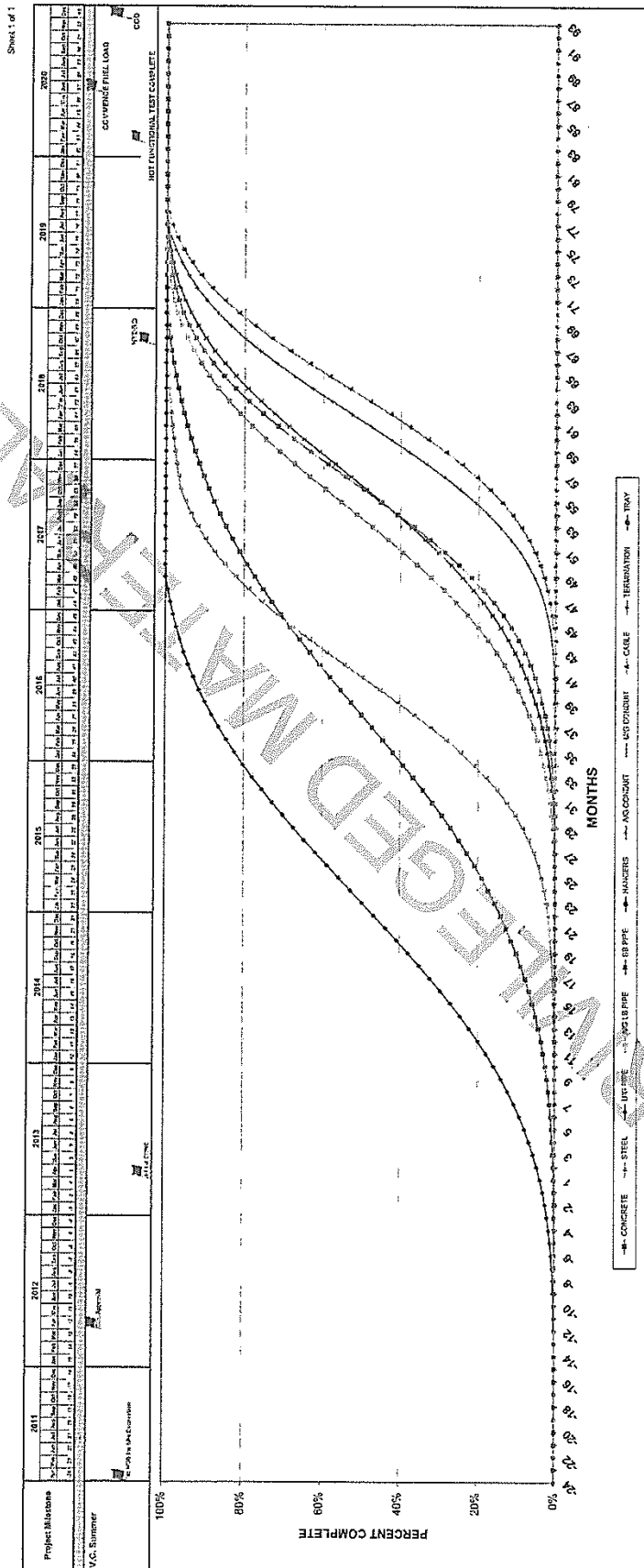
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Figure 5-2. Unit 2 Midpoint Forecast - Total Family of Curves



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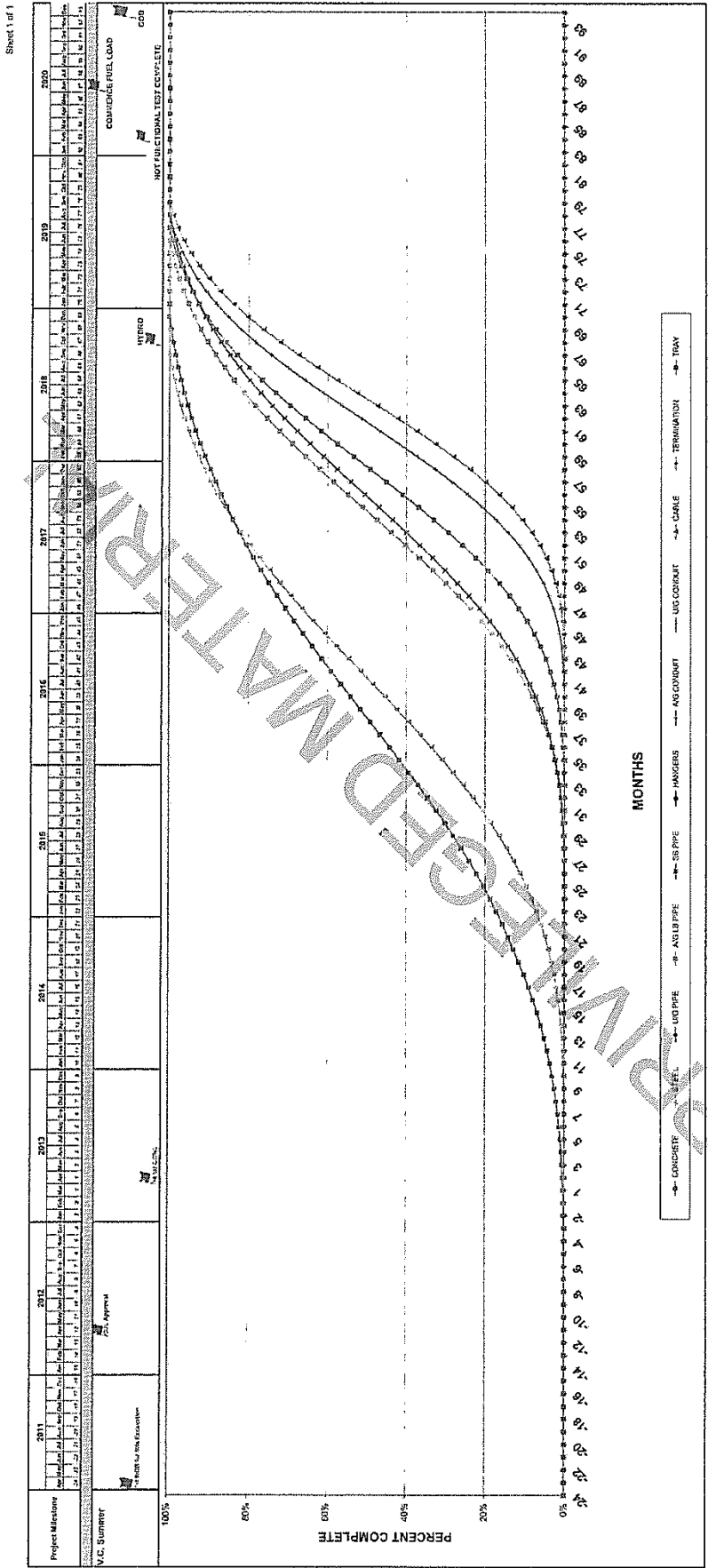
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Figure 5-3. Unit 2 Midpoint Forecast - Nuclear Island Family of Curves



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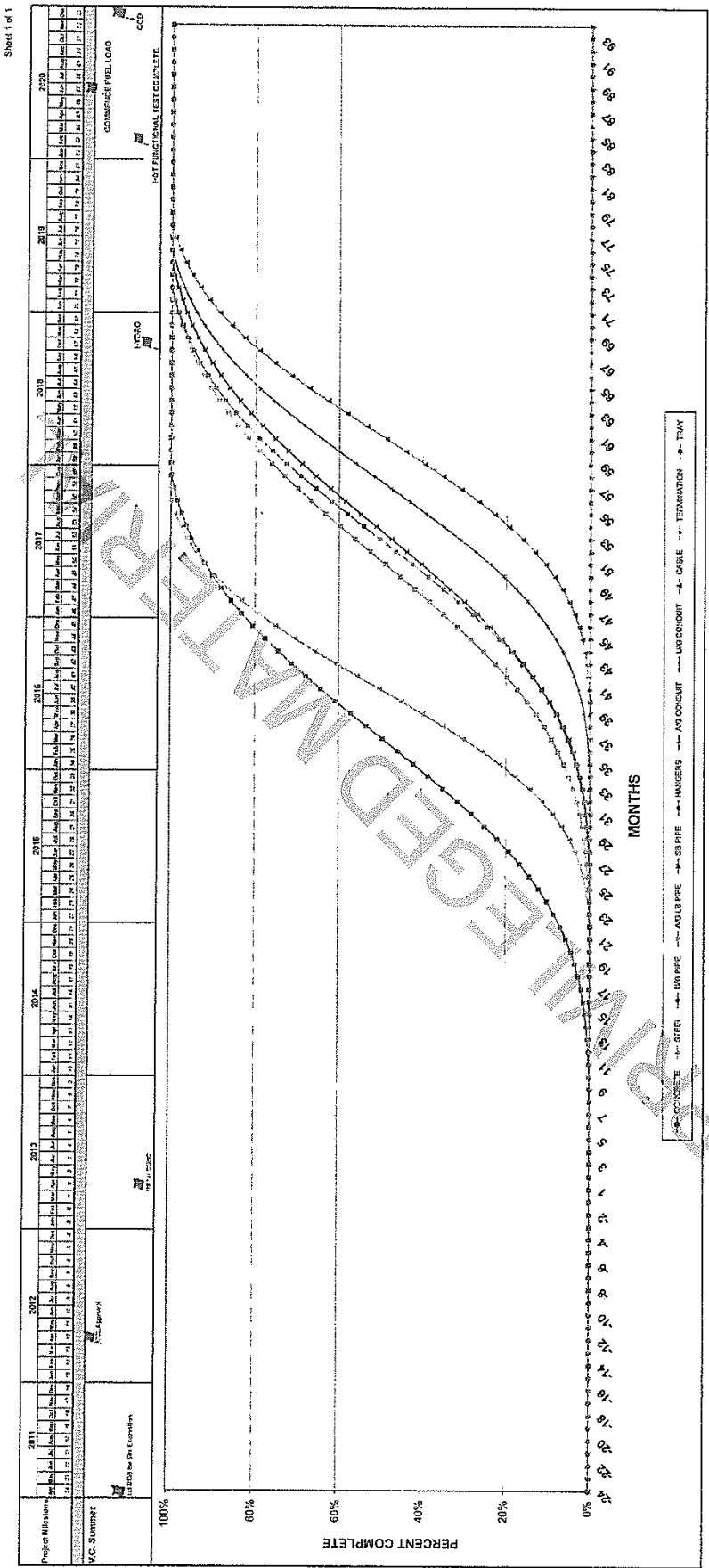
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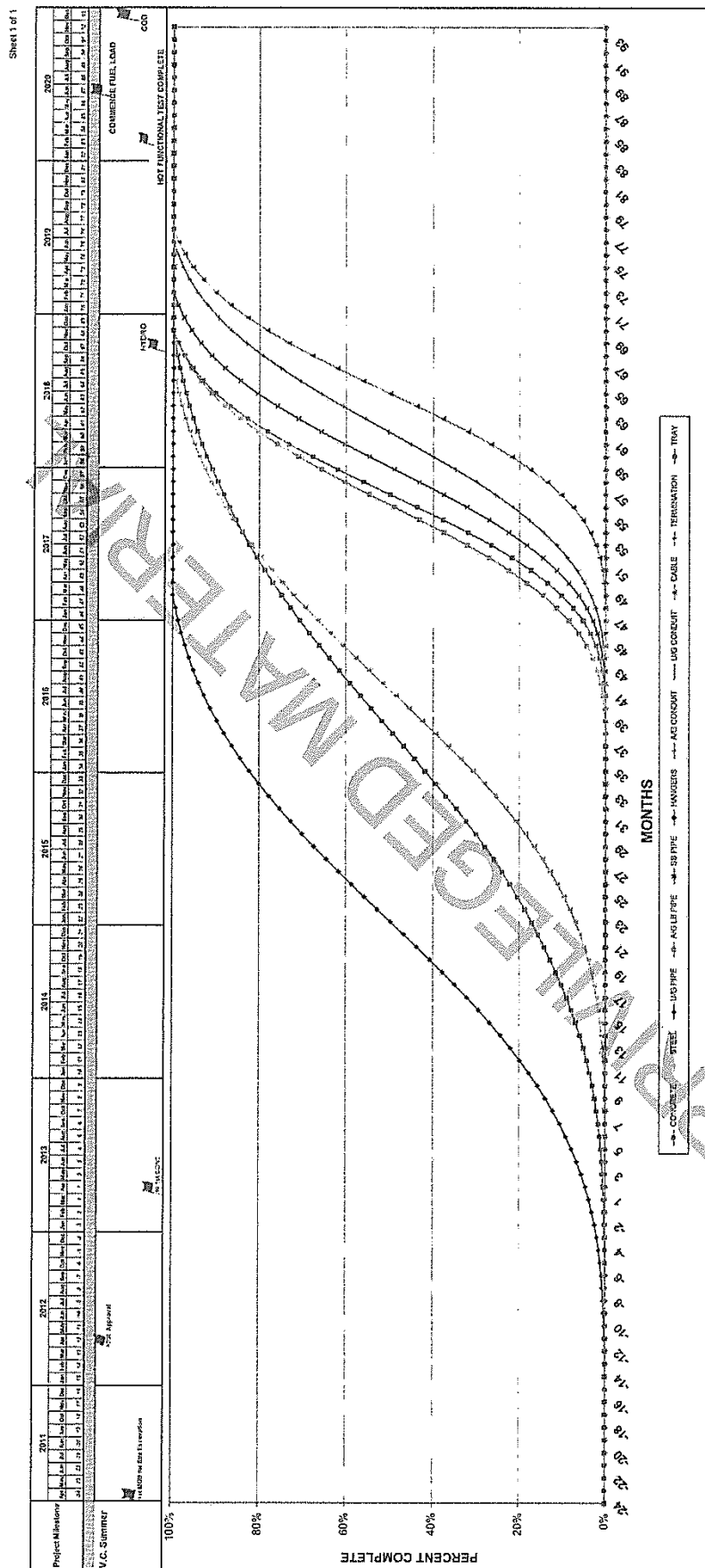
Figure 5-4. Unit 2 Midpoint Forecast - Turbine Island Family of Curves



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Figure 5-5. Unit 2 Midpoint Forecast - Balance of Plant Family of Curves

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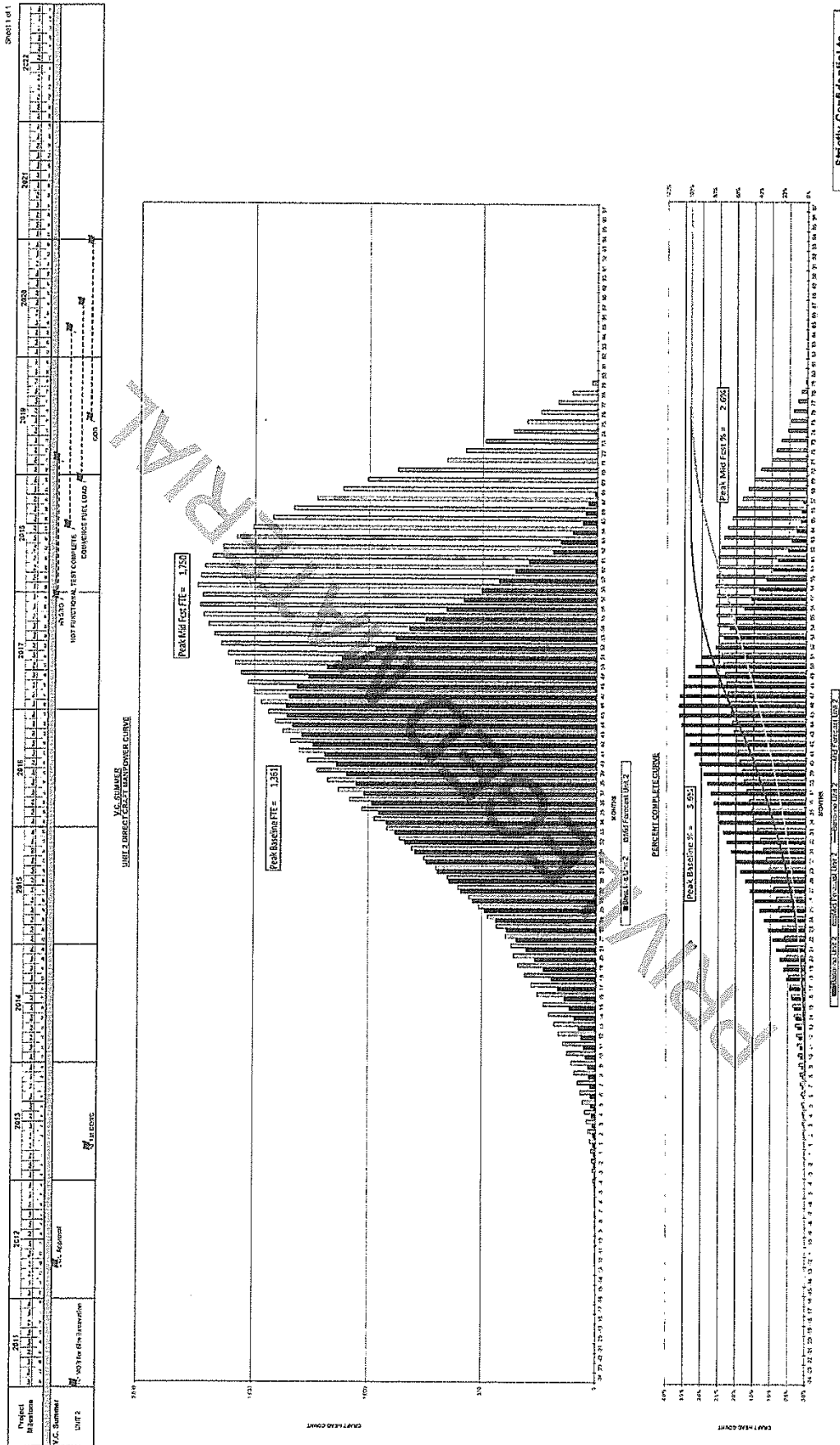
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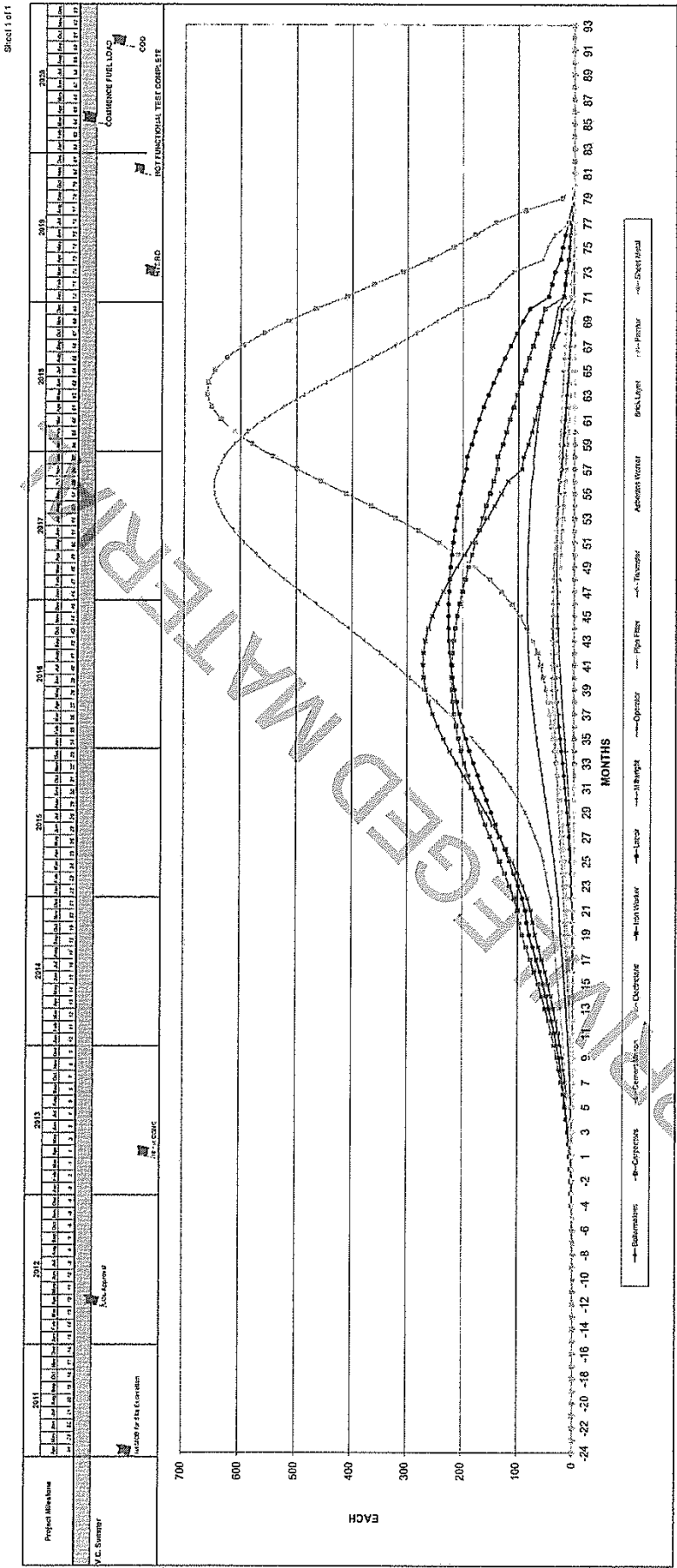
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Figure 5-6. Unit 2 Direct Craft Manpower Curve and Percent Complete Curve



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Figure 5-7. Unit 2 Headcount by Craft (Does not Incl SIC Hrs)



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Project Reference	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021
V.C. Summary											
	HOT FIBERGLASS INSULATION										
	ROOF INSULATION SYSTEM COMPLETE										
	ELECTRIC AND PAINT INSTALLATION										
	CLOSING										

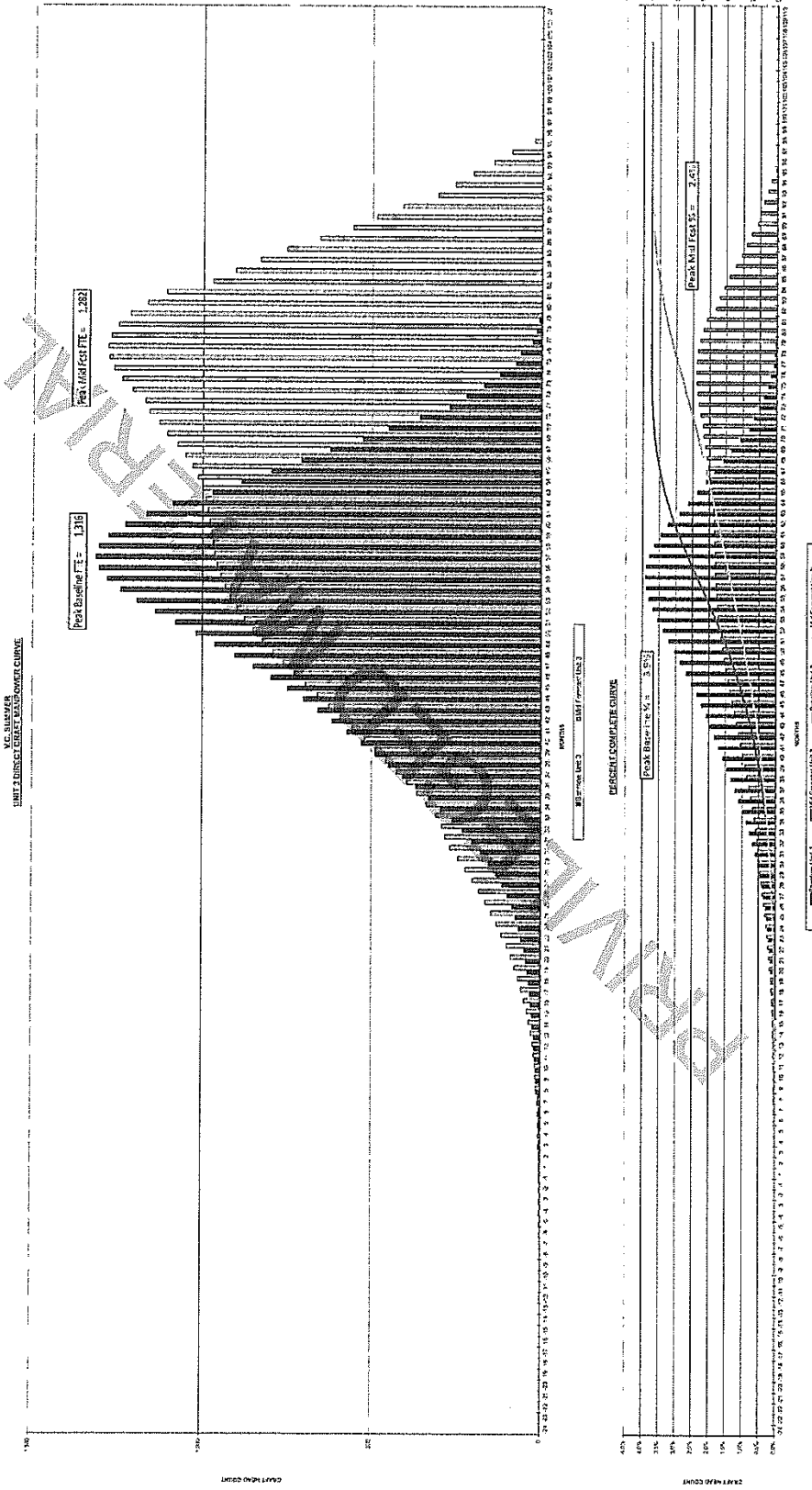
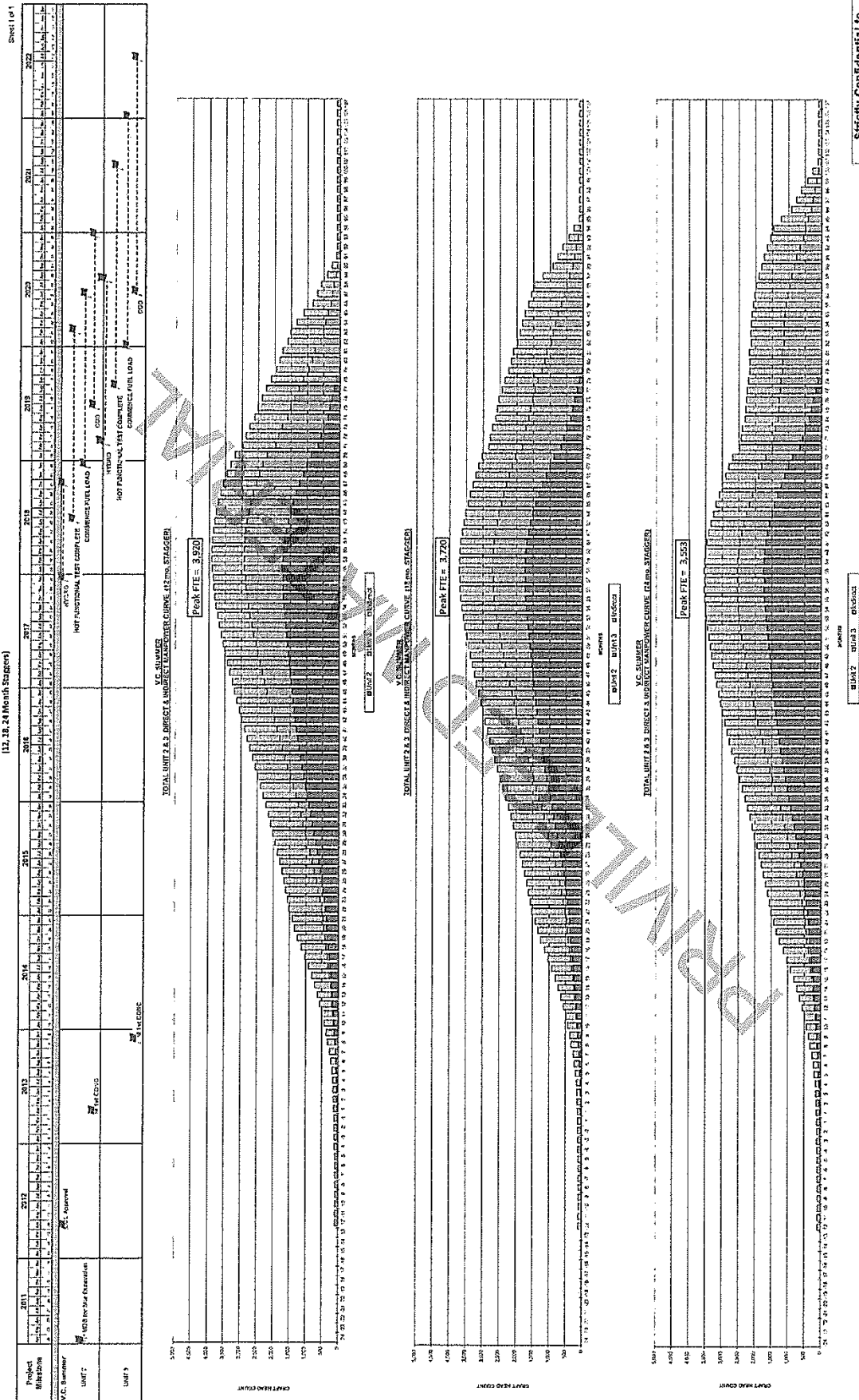


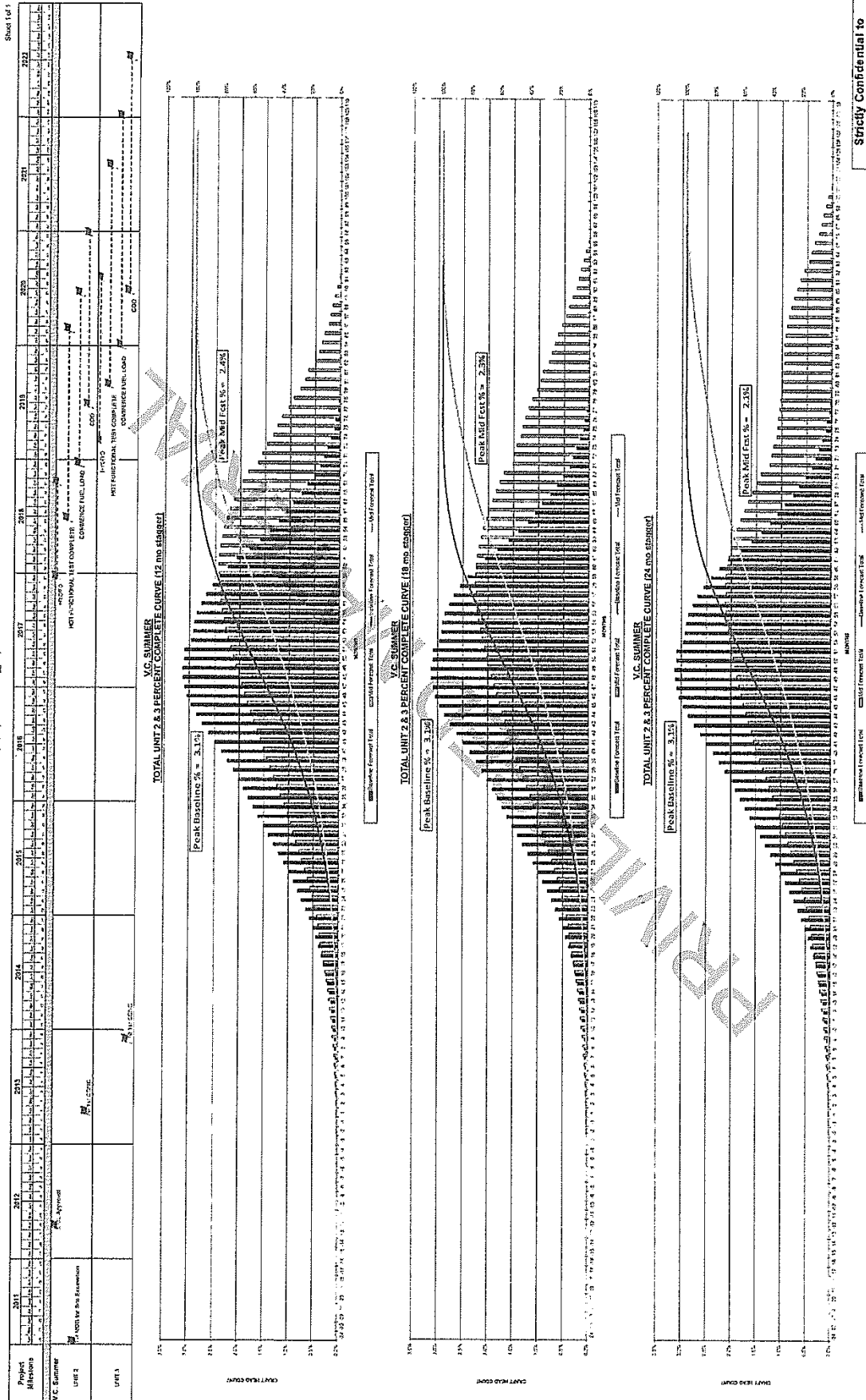
Figure S-9. Total Unit 2-3 Direct Indirect Manpower Curves (12, 18, 24 Month Scenarios)



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6. Startup

This section describes the assessment of the startup aspects of the project. Section 6.1 provides a summary of the current status. Section 6.2 provides startup observations and recommendations.

6.1 Current Status

6.1.1 Initial Test Program Organization

The Initial Test Program (ITP) is set up for an integrated organizational approach. The Owners have overall responsibility for the ITP; however, leadership has been delegated to the Consortium, and a WEC employee has been named the test director. The balance of the organization will be a mix of Owner and Consortium supplied personnel.

Reporting to the test director is the Component Test Group (CTG), currently led by a CB&I employee. The CTG will take turnover of systems from construction and conduct component testing. CTG test engineers will be discipline based and will specialize in the type of component tests related to his/her discipline (electrical, mechanical, control systems).

The test director leads the Preoperational Test Group (PTG). The PTG will take system turnovers from the CTG, conduct system start-up and tuning, and write and conduct system preoperational tests. Each PTG test engineer will be the point of contact for each of his/her assigned systems and will manage and execute all system-level testing activities. The project plan currently includes 155 to 160 systems and subsystems.

The Startup Test Group (STG) is also currently led by the test director. The STG will take system/facility turnover from the PTG and will support preparations for fuel load and the power ascension program.

The ITP organization is structured similarly to those used in many nuclear power plant facilities. There is a separation between component testing, system testing, and power ascension testing activities that will facilitate high confidence in the results of the test program. It is a program that integrates the Owner, NSSS supplier, and designer/constructor personnel to leverage the right resources to properly progress through component testing, preoperational testing, and power ascension.

In addition, the currently assigned test director has worked for many years in the nuclear power industry, with a significant track record in operation, outage management, and startup of nuclear power plants. This test director appeared well organized and to have a good grasp of the complexity of the project and how to approach it.

6.1.2 Test Program Integrity

a. Transition from Construction to the Initial Test Program

To separate the bulk construction program from the ITP, a formal turnover process will designate the official transfer of care, custody, and control from construction to the CTG. Boundary identification packages (BIPs) have been established to break the facility into smaller and more manageable blocks. There are currently about 555 BIPs that will be the basis for turning the facility equipment over to the CTG.

To provide further separation, performance of work activities will switch from the Consortium's QA program to the Owner's QA program. Subsequent construction access to systems transferred to the CTG will be controlled by a work authorization process controlled by the CTG. The work authorization process will provide for the release of work, ensure system configuration supports the nominated construction activity, and identify any required re-testing of components.

The above is intended to provide a high level of confidence that completed testing activities are not invalidated by unauthorized construction activities and are consistent with the approach used in many nuclear power plant facilities.

b. Preoperational Test Procedure Plan

All system preoperational tests will be treated as if they were safety related (i.e., a single development, review, approval, and performance process regardless of the safety significance of the test). The review plan also provides for a full NRC review cycle and a full Joint Test Working Group (JTWG) review/approval cycle prior to test performance and after performance (test results).

Preoperational test specifications are being developed to identify and collect all requirements to be included in each test procedure. The intent is to assemble the design requirements, system parameters, regulatory requirements, ITAAC commitments, and all acceptance criteria for each system. After each test specification is reviewed and approved, the system preoperational test procedure will be developed.

The above is intended to provide a high level of confidence that the preoperational test program adequately demonstrates the integrity of the systems installed in the plant.

c. Startup and Power Ascension Test Procedure Plan

Power ascension test procedures are similar for the new AP1000 units at V.C. Summer and Vogtle, and the Test Director is coordinating a combined effort to get the basic test procedures developed through a sharing of responsibility to develop the procedures. The total list was divided between the two sites. After each site develops its assigned tests, it should be a simple exercise to "localize" each of the procedures to ensure they become specific to each site.

d. Control Circuit Testing

To verify what has been installed is exactly per the project drawings, the CTG will verify control wiring "point to point" (cold checked) prior to being energized. After cold checking, the circuits will be energized and verified for functional correctness. Initial checks on the control loops may be conducted from remote stations since the current schedule does not suggest the control room will be ready. However, to meet the NRC regulatory guide requirement, those control loops initially verified from remote stations will be re-verified from the control room after it is available. This facilitates an earlier start of control loop functionality to support earlier equipment initial operation, as well as final verification to meet the stipulations in the regulatory guide.

e. Component Test Data Base

All component testing is to be tracked, planned, and statused using an Excel spreadsheet (Component Test Matrix) that is currently loaded from a manual takeoff of P&IDs, and it will be kept current through review of all changes issued by engineering. The spreadsheet includes planned durations of each activity, allows entry of actual durations, and calculates percent complete of each and cumulative activities (activity durations should not be confused with jobhours associated with each activity). Real-time updates of completed data records will be made manually on a daily basis, or as turned in to the admin doing the entry, for a reasonably current representation of progress/status. This is separate from the tracking of ITAAC activity progress.

A completions database is a typical, but critical, element in the control and management of the testing activities. What separates this from the typical completions databases is the ability to apply estimated durations to each activity, and use the results to support schedule development. Manloading and levelization of resources will still be performed in the commercial scheduling software.

6.1.3 Training of Operations and Maintenance Personnel

Training of permanent plant operations and maintenance personnel is the responsibility of the Owner. This was not specifically reviewed; however, it was briefly discussed during interviews with the ITP personnel. The current plan includes significant participation of the operations and maintenance personnel in the entire ITP, from component testing through preoperational testing. This is important to the preparation of the plant staff in their assumption of responsibility for system operation prior to fuel load and is consistent with the approach used in many nuclear power plant facilities.

6.1.4 Test Program Staffing

The current staffing plan has a peak (Unit 2/Unit 3 overlap) of 75 WEC test engineers, about 60 CB&I component test engineers, and about 25 Owner personnel. The staffing seems a little higher than the staffing needed based on previous preoperational and startup testing programs at

nuclear power plant facilities; however, historical dual unit plant startups were typically staggered 12 to 18 months apart, not the 8 to 9 months currently on the project schedule.

The test group will have a dedicated craft labor pool that comes out of construction. The WEC labor budget has been verified against the current staffing plan, while the CB&I budget has not yet been verified but is in progress.

6.1.5 Test Program Schedule

a. Schedule Development/Maturity

The component testing and preoperational testing schedules are developed to the point where prerequisite activities and associated ties are established, and the system-level fragnet templates have been loaded to each startup system. Additionally, standard activity durations have been plugged-in and the group is in the beginning phases of adjusting the durations per the Component Test Matrix and the estimated durations for preoperational tests based on complexity. It is too early to determine if the overall schedule duration will be consistent with the 17 to 18 months currently planned between energization and fuel load, as it may take 3 to 4 months to complete the adjustments and perform resource leveling exercises.

b. Construction Turnover to CTG

Review of the Construction to Component Test Group BIP turnover waterfall schedule indicates turnovers are planned to occur from September 2015 through January 2019; the distribution is as follows:

- 2015: 2 turnovers
- 2016: 44 turnovers (cumulative 46)
- 2017: 475 turnovers, 86% of total (cumulative 521, 94% of the total BIPs)
- 2018: 33 turnovers (cumulative 554)
- 2019: 1 turnover (Cumulative 555)

The current plan calls for 86% (or 475) of the BIPs to be turned over in 2017 alone, which is more than 30 BIPs per month. This is a high rate of turnovers that will be difficult to maintain. Even though the turnover process allows for consolidation of BIPs into fewer, larger turnover packages; this rate still indicates that 86% of the systems will be turned over to the CTG in a 12 month period.

This high number of turnovers produces a cumulative total of 94% at the end of 2017; yet, terminations are shown to be less than 70% complete in most areas. The turnover of completed BIPs does not seem to match the number of terminations completed, as it indicates that the last 6% of the BIPs contain over 30% of the terminations, which does not seem correct.

In addition, stringing the turnover of systems over a 31-month period may present problems. The concept of simultaneous operations, where bulk construction activities will be conducted in close proximity to components (and potentially systems) that will be energized and in testing introduces the concepts of Permit to Work (Energized Equipment Lockout/Tagout) and NFPA 70E, Standard for Electrical Safety in the Workplace (arc flash protection). This extends the period of time that poses safety risk to personnel and has a higher potential to slow installation of construction bulks and slip schedule. This can all be managed; but, a total turnover duration (first turnover to last turnover) of 18 to 20 months is more typical of nuclear power plant facilities.

The current project schedule indicates an approximate 9 month stagger between Unit 2 and Unit 3 hot functional tests. This is more aggressive than what was experienced on many past nuclear power plant facilities, which could preclude leveraging personnel from Unit 2 on Unit 3, as well as introducing the concept of two new units on the same site overlapping initial fuel load activities and initial power ascension.

6.2 Observations and Recommendations

Startup observations and recommendations are identified in Table 6-1.

Table 6-1. Startup Observations and Recommendations	
No.	Description
S1	<p><u>Observation(s)</u> The current ITP staffing plan includes heavy Tech Staff, Operations, and Maintenance staff participation.</p> <p><u>Recommendation(s)</u></p> <ul style="list-style-type: none"> • (Other) Be diligent with dedication of these resources to support the ITP. The hands-on experience acquired through participation in the test program is important to good performance during the early days of plant initial operation.
S2	<p><u>Observation(s)</u> The current schedule identifies about 8 months lag between the Unit 2 and Unit 3 hot functional tests. This lag is significantly shorter than previous dual unit nuclear sites, and drives the testing group staffing levels fairly high.</p> <p><u>Recommendation(s)</u></p> <ul style="list-style-type: none"> • (Priority 2) Evaluate the likelihood of realizing an 8 month lag between Units 2 & 3. If realistic, ensure mitigations have been planned in case of events on one of the units while the other is in the vulnerable position of still in the testing phase. If not realistic, consider historical lags closer to 12 to 18 months.
S3	<p><u>Observation(s)</u> The construction turnover of BIPs to the CTG is planned to occur over a 31-month period. This is a long time to have equipment in various stages of testing and layup.</p>

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Table 6-1. Startup Observations and Recommendations	
No.	Description
	<u>Recommendation(s)</u> <ul style="list-style-type: none"> • (Priority 2) Consider reducing the duration of the turnover period to 18 months. This may permit reallocation of resources to complete systems in a more reasonable schedule, reduce the duration the facility would be in a simultaneous operations mode, and possibly reduce the cost of actually completing BIPs.
S4	<u>Observation(s)</u> The timing of construction completion of bulks does not align with the timing of BIP turnovers. At the end of 2017, construction plans to be less than 70% complete with terminations, yet, plans to have turned over 94% of the BIPs.
	<u>Recommendation(s)</u> <ul style="list-style-type: none"> • (Other) Reexamine construction terminations per cent complete compared to BIP turnovers and adjust the project schedule accordingly.
S5	<u>Observation(s)</u> The overall ITP organization and program are well thought out and follow proven philosophies and processes.
	<u>Recommendation(s)</u> <ul style="list-style-type: none"> • (Other) Continue along this execution plan and make modifications only if project or regulator changes warrant them.

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7. Conclusions

The AP1000 is a first-of-a-kind technology, 10 CFR 52 is a new licensing process, and these are the first new nuclear plants being constructed in the U.S. in decades. Challenges would be expected.

However, the V.C. Summer Units 2 & 3 project suffers from various fundamental EPC and major project management issues that must be resolved for project success:

- The Consortium's project management approach does not provide appropriate visibility and accuracy to the Owners on project progress and performance.
- The Consortium's forecasts for schedule durations, productivity, forecasted manpower peaks, and percent complete do not have a firm basis. Bechtel's assessment, based on certain assumptions, of the Unit 2 and 3 commercial operation dates indicates:

Impacts on Commercial Operation Dates		
	Unit 2	Unit 3
Current COD	June 2019	June 2020
Adjustment	18 to 26 months	24 to 36 months
New COD	Dec 2020 to Aug 2021	June 2022 to June 2023

- There is a lack of a shared vision, goals, and accountability between the Owners and the Consortium.
- The Consortium lacks the project management integration needed for a successful project outcome.
- The WEC-CB&I relationship is strained, caused to a large extent by commercial issues.
- The overall morale on the project is low.
- The Contract does not appear to be serving the Owners or the Consortium particularly well.
- The issued design is often not constructible resulting in a significant number of changes. The construction planning and constructability review efforts are not far enough out in front of the construction effort to minimize impacts.
- There is significant engineering and licensing workload remaining (currently over 800 engineers). ITAAC closure will be a significant effort.
- Emergent issues potentially requiring NRC approval of LARs remain a significant project concern.

- There is a significant disconnect between construction need dates and procurement delivery dates.
- The amount of stored material onsite is significant, creating the need for an extended storage and maintenance program.
- Construction productivity is poor for various reasons including changes needed to the design, sustained overtime, complicated work packages, aging workforce, etc.
- The indirect to direct craft ratio is high.
- Field non-manual turnover is high.
- The Owners do not have an appropriate project controls team to assess/validate Consortium reported progress and performance.
- The schedule for the startup test program is in the early stages of development. The BIP turnover rate appears to be overly aggressive.

The overall top priority recommendations from Bechtel's assessment that will significantly help to ensure the project is on the most cost efficient trajectory to completion are identified below:

- Owners – Develop an Owners' Project Management Organization (PMO) and staff with EPC-experienced personnel. (O&R PM1)
- Owners and Consortium – Align Contract commercial conditions with the project goals and determine the realistic to-go forecast costs for project completion. (O&R PM4)
- Consortium – Create a new, more achievable, project schedule:
 - Remove the 50 mandatory constraints from the Integrated Project Schedule and allow the schedule to move based on the logic. Prioritize the development of mitigation/recovery plans based on their impact to the schedule. (O&R CPC25)
 - Consortium – Ensure appropriate time is allocated for the installation of bulk commodities (large and small bore piping, pipe supports, cable tray, conduit, cabling). Confirm bulk quantities and update the schedule forecast based on the median range of achievable sustained installation rates. (O&Rs CPC5, CPC26, CPC35, CPC36, and CPC37)
- Consortium – Initiate a focused effort to complete WEC known engineering "debt". (O&Rs E2 and E9)
- Consortium – WEC engineering maintain focus on releasing the over 1,000 drawing holds that exist. (O&R E13)

- Consortium – Intensify the efforts of the Strategic Planning group, work package planning, constructability reviews, etc. to identify design changes needed well in advance of the construction need date. (O&Rs E7, CPC17, and CPC18)
- Consortium – WEC and CB&I engineering should get ahead of construction and incorporate E&DCRs into design drawings so that construction planning is simplified and takes less time. (O&R E10)
- Consortium – WEC engineering stay on top of emergent technical issues including maintaining focus on the increase in approved DCPs/Doc Pairs requiring closure. (O&R E9)
- Consortium – To improve craft productivity and retention, reduce the work week to no more than 48 hours (4-10s and 1-8 hours) and consider a craft incentive of \$1/hour which would only be paid when a reduction in force occurs. (O&R CPC13)
- Consortium – Increase manual staffing levels to allow working of all available work areas. Evaluate methods to have the craftsmen spend more time at the workplace. (O&Rs CPC16 and CPC24)
- Consortium – Simplify and streamline work packages. (O&Rs E2, P18, and CPC22)
- Consortium – Complete the inventory revalidation effort and establish a program to continually validate inventory. (O&R P5)
- Consortium – Expedite the implementation of blanket purchase orders. (O&R P8)
- Consortium – Complete the procurement schedule adherence effort to ensure equipment delivery dates meet construction need dates. (O&R P17)

Bechtel recognizes that the recently announced purchase of CB&I nuclear by WEC may change some of the recommendations regarding the Consortium. Nonetheless, most of the recommendations identified in this report still apply to the project under the new EPC contract structure.

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Appendix A

Documents Received from the Owners and the Consortium

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Appendix A

Documents Reviewed from the Owners and the Consortium

Documents reviewed during the assessment are identified in Table A-1.

Table A-1. Documents Reviewed During the Assessment		
No.	Description	Hard Copy (HC) or Electronic (E)
1.1	VCS Project Supply Chain Management-Procurement Plan, VSG-GW-GPH-010), 5/8/15, 87 pages	E
1.1.1	VCS Project Construction Execution Plan (VSG-GW-GCH-001), Rev 2, 11/19/09, 64 pages	E
1.1.2	VCS Project Resource Staffing Plan, VSG-GW-GXH-001), 2/6/09, 11 pages	E
1.1.3	VCS Project Regulatory-Licensing Management Plan, (VSG-GW-G:H-001), Rev 5, 6/5/09, 14 pages	E
1.1.4	VCS Project Execution Plan (VSG-GW-GBH-300), Rev 3, 8/13/09, 52 pages	E
1.1.5	VCS Project Engineering Plan (VSG-GW-GEH-001), Rev 2, 1/18/12, 50 pages	E
1.1.6	VCS Project Completion and Closeout Plan (VSG-GW-GBH-370), Rev 1, 3/4/09, 19 pages	E
1.1.7	VCS Integrated Project Risk Management Plan (VSG-GW-GBH-310), Rev 1, 9/5/13, 10 pages	E
1.1.8	VCS ITAAC Program Execution Plan (VSG-GW-GLH-002), Rev 3, 1/12/15, 37 pages	E
1.1.9	NNDG-CS-0001 Rev. 5 - Oversight of Construction Activities (NNDG-CS-0001), Rev 5, 1/22/15, 8 pages	E
1.1.10	Project Oversight Strategy Plan, Rev. 2, 11/12/14, 28 pages	E
1.1.11	NNDG-AP-0003 - Oversight Plan Development and Execution (NNDG-AP-0003), 6/11/14, 10 pages	E
1.1.12	NND-CS-0013 - Risk Assessment of Consortium Construction Activities, 1/22/15, 9 pages	E
1.1.13	NND-QS-0006 Rev. 2 - NND QS Audits, Rev 2, 12/17/15, 40 pages	E
1.1.14	NND-CS-0013 Attachment 1 From Review 06-18-2015, 6/18/15, 7 pages	E
1.1.15	NND-AP-0308 Rev. 0 - Construction Readiness Review Procedure, 5/29/14, 9 pages	E
1.1.16	NND-AP-0304 Rev. 1 - Construction Oversight, Rev 1, 4/30/13, 11 pages	E
1.1.17	NND-AP-0024 Rev. 3 - Assessment Program, Rev 3, 10/9/14, 83 pages	E
1.1.18	NND-AP-0018 Rev. 5 - Observation Program, Rev 5, 2/3/15, 33 pages	E
1.1.19	AP1000 Initial Test Program - Commissioning Program and Turnover	E

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Table A-1. Documents Reviewed During the Assessment		
No.	Description	Hard Copy (HC) or Electronic (E)
	Plan (VSG-GW-GBH-360), Rev 2) , 1/12/15,129 pages	
1.1.20	NND-AP-0002 Rev. 15 - Corrective Action Program (NND-AP-0002), Rev 15), 3/31/15,63 pages	E
1.2	V.C. Summer Units 2 & 3 Monthly Status Report - MARCH 2015, 107 pages	E
1.2.1	V.C. Summer Units 2 & 3 Monthly Status Report - JUNE 2015, 111 pages	E
1.2.2	V.C. Summer Units 2 & 3 Monthly Status Report - APRIL 2015, 116 pages	E
1.2.3	V. C. Summer Units 2 & 3 Monthly Status Report - MAY 2015, 112 pages	E
1.2.4	2015 07 16 - July PRM (final), 7/16/15,170 pages	E
1.2.5	2015 06 17 - June PRM Slides (Final), 6/18/15,181 pages	E
1.2.6	2015 05 21 - May PRM (final), 168 pages	E
1.2.7	2015 04 17 - April PRM (final as presented), 154 pages	E
1.2.8	2015 03 17 - March PRM (final), 154 pages	E
1.3	June 2015 Consortium Monthly Meeting Minutes, 6-18-15, 103 pages	E
1.3.1	May 2015 Consortium Project Review Meeting Minutes, 6-17-15, 97 pages	E
1.3.2	May 2015 Project Review Meeting Minutes - Owner Comments, 5-21-15, 7 pages	E
1.3.3	March 2015 Project Review Meeting Minutes - Owner Comments, 3/19/15, 8 pages	E
1.3.4	March 2015 Consortium Project Review Meeting Minutes, 4/8/15, 88 pages	E
1.3.5	June 2015 Project Review Meeting Minutes - Owner Comments, 6/18/15, 9 pages	E
1.3.6	June 2015 Consortium Project Review Meeting Minutes, 7/14/15, 103 pages	E
1.3.7	April 2015 Project Review Meeting Minutes - Owner Comments, 4/16/15, 8 pages	E
1.3.8	April 2015 Consortium Project Review Meeting Minutes, 90 pages	E
1.5	VC Summer Site Overall Craft Staffing (Includes Absenteeism and PF) dated 5/5/2015, 1 pages, 11 X 17	HC
1.5.1	VC Summer Site Overall Craft Forecast and Actuals, dated 8/27/15, 1 pages, 11 X 17	HC
1.5.2	Power Leadership_CBI_as of Jan 2015, 1 page	E
1.5.3	NND Staffing_8-15 (Owner Staffing), 2 pages	E
1.6	Westinghouse Engineering org charts for VCS Assessment, 6-1-15, 7 pages	E
1.6.1	NP&MP Org Charts for VCS Assessment – 6-1-15, 8 pages	E

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Table A-1. Documents Reviewed During the Assessment		
No.	Description	Hard Copy (HC) or Electronic (E)
1.6.2	Westinghouse Nuclear Automation org charts for VCS Assessment - July 28, 2015, 8 pages	E
1.6.3	VC Summer Site Org Chart - CB&I - Jan 2015, 1/29/15, 16 pages	E
1.6.4	Westinghouse Nuclear Automation org charts for VCS Assessment - July 28, 2015, 8 pages	E
1.6.5	Westinghouse Engineering org charts for VCS Assessment - July 28, 2015, 7 pages	E
1.6.6	WEC VCS Org Chart - Site 07-28-15, 1 page	E
1.6.7	Power Leadership CBI 2015.7.15, 1 page	E
1.6.8	NP&MP Org Charts for VCS Assessment, 6/1/15, 22 pages	E
1.6.9	NP&MP Org Charts for VCS Assessment - July 28, 2015, 22 pages	E
1.7	Calendar of Weekly/Monthly Meetings (w/Owner attends highlighted), 3 pages, 8.5 X 11	HC
1.8	Top 17 Risks – Mitigation Plans (As of August 3, 2015; VC Summer Schedule Risk Register, dated 8/5/15, 14 pages, , 8.5 X 11	HC
1.8.1	VCS Items Meeting, dated 9/4/15, 9 pages, , 8.5 X 11	HC
1.8.2	VC Summer Plan of the Day – 9/3/15, 36 pages, PowerPoint, 8.5 X 11	HC
2.1	Design Completion (Luca Oriani, Westinghouse), 5 pages, 8.5 X 11	HC
2.3.1	WEC PCC Level 1 Critical Issues List, 3 pages, 11 X 17	HC
2.3.2	Issues List, dated 9/4/15, 5 pages, 8.5 X 11	HC
2.8.	Pending DCP List, 9/3/15, 4 pages, 8.5 X 11	HC
2.8.1	VC Summer LAR Cross Reference, 9/10/15, 18 pages, PowerPoint 8.5 X 11	HC
2.8.2	Overview of the AP1000 Design Change Process, dated 1/14/15, 18 pages, PowerPoint, 8.5 X 11	HC
2.9	AP1000 Plant Major Milestones, 28 pages, PowerPoint 8.5 X 11	HC
2.9.1	P&ID Revisions (P2P, 8/31/15), 10 pages, 11 X 17	HC
3.2	Weekly Modules 4-Box Report - 07-14-15 Rev. 1, 37 pages	E
4.1	VCS 2 & 3 Weekly Construction Metric 15-07-27, 58 pages	E
4.2.1	Unit 3 Total CB&I Commodity Percents Complete (graph), dated 9/3/15, 3 pages, 11 X 17	HC
4.2.2	VC Summer Site Total CB&I Percents Complete (graph)	HC
4.2.3	Unit 2 CB&I Commodity Percents Complete	HC
4.3	VCS Project Subcontracting Strategy – Report, dated 8/31/15, 17 pages, 11 X 17	HC
4.4	VC Summer Daily Report 7 21 2015, 7/21/15, 6 pages	E
4.5	VC Summer Equipment List, 25 pages, 8.5 X 11	HC
5.1	2015-08-03 Month End U3 Integrated Calc Major Milestone-Key Dates, 8/6/15, 1 page	E
5.1.1	2015-08-03 Month End U2 Integrated Calc Major Milestone-Key	E

Table A-1. Documents Reviewed During the Assessment		
No.	Description	Hard Copy (HC) or Electronic (E)
	Dates, 8/6/15, 1 page	
5.1.2	2015-06-29 Month End U3 Integrated Calc Major Milestone-Key Dates, 7/7/15, 1 page	E
5.1.3	2015-06-29 Month End U2 Integrated Calc Major Milestone-Key Dates, 7/7/15, 1 page	E
5.1.4	2015-06-01 Month End U3 Integrated Calc Major Milestone-Key Dates, 6/5/15, 1 page	E
5.1.5	2015-06-01 Month End U2 Integrated Calc Major Milestone - Key Dates, 6/5/15, 1 page	E
5.1.6	2015-04-27 Month End U2 Integrated Calc Major Milestone-Key Dates, 4/28/15, 1 page	E
5.1.7	2015-04-27 Month End U3 Integrated Calc Major Milestone-Key Dates, 4/28/15, 1 page	E
5.1.8	2015-03-30 Month End U3 Integrated Calc Major Milestone-Key Dates, 4/9/15, 1 page	E
5.1.9	2015-03-30 Month End U2 Integrated Calc Major Milestone-Key Dates, 4/9/15, 1 page	E
5.2	2015-08-03 U3 Crit Path ILRT, 8/5/15, 4 pages	E
5.2.1	2015-08-03 U3 Crit Path COD, 8/5/15, 4 pages	E
5.2.2	2015-08-03 U2 Crit Path ILRT, 8/5/15, 4 pages	E
5.2.3	2015-08-03 U2 Crit Path COD, 8/5/15, 5 pages	E
5.2.4	2015-06-29 U3 Crit Path ILRT, 6/30/15, 4 pages	E
5.2.5	2015-06-29 U3 Crit Path COD, 7/7/15, 4 pages	E
5.2.6	2015-06-29 U2 Crit Path ILRT, 6/29/15, 3 pages	E
5.2.7	2015-06-29 U2 Crit Path COD, 7/7/15, 4 pages	E
5.2.8	2015-06-01 U3 Crit Path COD, 6/3/15, 4 pages	E
5.2.9	2015-06-01 U3 Crit Path ILRT, 6/4/15, 4 pages	E
5.2.10	2015-06-01 U2 Crit Path ILRT, 6/3/15, 3 pages	E
5.2.11	2015-06-01 U2 Crit Path COD, 6/2/15, 6 pages	E
5.2.12	2015-04-27 U3 Crit Path ILRT, 4/30/15, 4 pages	E
5.2.13	2015-04-27 U3 Crit Path COD, 4/30/15, 5 pages	E
5.2.14	2015-04-27 U2 Crit Path ILRT, 4/30/15, 5 pages	E
5.2.15	2015-04-27 U2 Crit Path COD, 4/30/15, 4 pages	E
5.2.16	2015-03-30 U3 Crit Path ILRT, 4/6/15, 4 pages	E
5.2.17	2015-03-30 U3 Crit Path COD, 4/6/15, 4 pages	E
5.2.18	2015-03-30 U2 Crit Path ILRT, 4/1/15, 4 pages	E
5.2.19	2015-03-30 U2 Crit Path COD, 4 pages	E
6.1	QA Audits at VC Summer 2014/2015, 1 page, 8.5 X 11	HC
6.1.1	Quality Assurance Scheduled Surveillances, dated 8/26/15, 18 pages, 8.5 X 11	HC

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Table A-1. Documents Reviewed During the Assessment		
No.	Description	Hard Copy (HC) or Electronic (E)
6.5	NND-AUD-201503 Owner's COL and Project Oversight Audit, 7/2/15, 16 pages	E
6.5.1	NND-15-0247 2015 Corrective Action Program Audit Report, 4/16/15, 9 pages	E
6.5.2	NND-15-0143 Parallel Module Fabrication Process Audit Report, 3/24/15, 8 pages	E
6.5.3	NND-15-0090 2015 Procurement Processes Audit Report, NND-AUD-201501, 2/20/15, 8 pages	E
6.5.4	2015 Audit Schedule Rev. 1, 6/12/15, 2 pages	E
7.1	Licensing Weekly 8-3-15, 10 pages	E
7.1.1	Licensing Weekly 8-10-15, 10 pages	E
7.1.2	Licensing Weekly 7-6-15, 11 pages	E
7.1.3	Licensing Weekly 7-27-15, 10 pages	E
7.1.4	Licensing Weekly 7-20-15, 10 pages	E
7.1.5	Licensing Weekly 7-13-15, 10 pages	E
7.1.6	Licensing Weekly 6-8-15, 11 pages	E
7.1.7	Licensing Weekly 6-29-15, 12 pages	E
7.1.8	Licensing Weekly 6-15-15, 11 pages	E
7.1.9	Licensing Weekly 6-22-15, 11 pages	E
7.1.10	Licensing Weekly 6-1-15, 11 pages	E
7.2.11	2015-08-10 VC Summer NRC Schedule, 3 pages	E
7.2.12	2015-08-03 VC Summer NRC Schedule, 3 pages	E
7.2.13	2015-07-27 VC Summer NRC Schedule, 3 pages	E
7.2.14	2015-07-20 VC Summer NRC Schedule, 3 pages	E
7.2.15	2015-07-13 VC Summer NRC Schedule, 3 pages	E
7.2.16	2015-07-06 VC Summer NRC Schedule, 3 pages	E
7.2.17	2015-06-29 VC Summer NRC Schedule, 3 pages	E
7.2.18	2015-06-22 VC Summer NRC Schedule, 3 pages	E
7.2.19	2015-06-15 VC Summer NRC Schedule, 3 pages	E
7.2.20	2015-06-08 VC Summer NRC Schedule, 3 pages	E
7.2.21	2015-06-01 VC Summer NRC Schedule, 3 pages	E
7.4	VCS Permit Status 6-11-15, 5 pages	E
7.8	NRC Report 8-4-15, 8/4/15, 3 pages	E
7.8.1	NRC Report 7-7-15, 7/7/15, 3 pages	E
7.8.2	NRC Report 7-21-15, 7/21/15, 3 pages	E
7.8.3	NRC Report 7-14-15, 7/14/15, 3 pages	E
7.8.4	NRC Report 6-9-15, 6/9/15, 3 pages	E
7.8.5	NRC Report 6-2-15, 6/2/15, 3 pages	E

Table A-1. Documents Reviewed During the Assessment		
No.	Description	Hard Copy (HC) or Electronic (E)
7.8.6	NRC Report 6-16-15, 6/16/15, 3 pages	E
7.8.7	NRC Report 5-5-15, 5/5/15, 3 pages	E
7.8.8	NRC Report 5-19-15, 5/19/15, 3 pages	E
7.8.9	NRC Report 5-13-15, 5/13/15, 3 pages	E
8.1	Engineering, Procurement and Construction Agreement between SCE&G, for itself and as Agent for the SC Public Service Authority, as owner and a Consortium consisting of Westinghouse Electric Company LLC and Stone & Webster, Inc., as Contractor for AP1000 Nuclear Power Plants Dated as of May 23, 2000 (Confidential Trade Secret Information – Subject to Restricted) dated 5/23/08 (176 pages, 8.5 X 11)	HC
9.1.1	Owner Org Charts - Bechtel Assessment, 1 page	E
9.1.1.2	Owner Org Charts - Bechtel Assessment, 14 pages	E
9.3	Exhibit A, Scope of Work/Supply and Division Responsibility, 62 pages, 8.5 X 11	HC
9.3.1	AP1000 Plant Division of Responsibility – VC Summer 2&3 (VSG-GW-G8Y-100), 70 pages, 8.5 X 11	HC
10.1	Commercial Review Meeting, dated 8/19/15, 7 pages, PowerPoint 8.5 X 11	HC
10.2	Unit 3 Standard Plant Performance (Month end July 2015), 1 page, 11 X 17	HC
10.12	VC Summer U0 CSI Site-Specific EPC, dated 9/7/15, 3 pages, 11 X 17	HC
11.2	Modules Illustration, 1 page, 8.5 X 11	HC
11.2.1	AP1000 Module Overview: NI Structural Modules, 166 pages, PowerPoint 8.5 X 11	HC
11.27	Project Controls Meeting Material (9/15 Meeting), 15 pages, 11X17	HC
12.1	VC Summer Plan of the Day, October 01, 2015, 33 pages, PowerPoint 8.5 X 11	HC
12.2	Nuclear Island Mechanical Systems Reference Document Package, AP1000, May 2015 (Includes General Arrangements, Room Numbering and Module Locations, 79 pages, 11X17	HC
12.3.1	Un-redacted Article 3 added (9/25/15) Un-redacted Article 7 added (9/25/15), but related Exhibit J, not added. Un-redacted Article 9 and 10 added (9/25/15) - Schedule E, project schedule – not added - Schedule F, milestone schedule – not added - Schedule J, price adjustment provisions – not added	HC
12.3.2	Agreement Change Order 1 – 7/14/08, Engineering, Procurement and Construction Agreement, 8 pages, 8.5 X 11	HC
12.3.3	Agreement Change Order 2 – 9/10/09 (provision of Limited Scope Simulators, LSS) 12 pages, 8.5 X 11	HC

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Table A-1. Documents Reviewed During the Assessment		
No.	Description	Hard Copy (HC) or Electronic (E)
12.3.4	Agreement Change Order 3 – 1/14/10, Parr Road Rehabilitation, 27 pages, 8.5 X 11	HC
12.3.5	Agreement Change Order 5 – 5/4/10, Revised Senior Reactor Operator Instructor Training Program, 37 pages, 8.5 X 11	HC
12.3.6	Agreement Change Order 6 – 6/29/10, (substitute HydraNuts ILO AP1000 Standard Plant reactor vessel stud tensioners . . .), 14 pages, 8.5 X 11	HC
12.3.7	Agreement Change Order 7 – 7/1/10, (Stone & Webster . . .), 9 pages, 8.5 X 11	HC
12.3.8	Agreement Change Order 8 – 4/11/11, (transfer Stone & Webster Target Price COW to Firm Price . . .), 51 pages, 8.5 X 11	HC
12.3.9	Agreement Change Order 9 – 11/23/10, (RFP to reconfigure outgoing transmission lines from VCS#2 switchyard . . .), 5 pages, 8.5 X 11	HC
12.3.10	Agreement Change Order 10 – 11/22/10, Access to Westinghouse Primavera Architecture, 12 pages, 8.5 X 11	HC
12.3.11	Agreement Change Order 11 – 2/14/11, Study and Analyze the Impact of Delayed COL. Receipt of Construction Schedule, 8 pages, 8.5 X 11	HC
12.3.12	Agreement Change Order 12 – 12/8/11, Impact from Health Care and Education Reconciliation Act of 2010, 12 pages, 8.5 X 11	HC
12.3.13	Agreement Change Order 13 – 2/14/12, Ovation Work Stations, 4 pages, 8.5 X 11	HC
12.3.14	Agreement Change Order 14 – 2/26/12, Cyber Security Phase 1, 53 pages, 8.5 X 11	HC
12.3.15	Agreement Change Order 15 – 2/16/12, WLS Discharge Piping, 4 pages, 8.5 X 11	HC
12.3.16	Agreement Change Order 18 – 9/17/14, Perch Guards, 6 pages, 8.5 X 11	HC
12.3.17	Agreement Change Order 19 – 10/1/14, Simulator Hardware/Software/Training, 11 pages, 8.5 X 11	HC
12.3.18	Agreement Change Order 20 – 12/2/14, Method of Calculating ACA Impact 2011, 2012, 2013, 8 pages 8.5 X 11	HC
12.3.19	Agreement Change Order 21 – 2/16/15, ITAAC Maintenance, 8 pages, 8.5 X 11	HC
12.3.20	Agreement Change Order 22 – 7/30/15, Common-Q Maintenance Training System Equipment and Software, 31 pages, 8.5 X 11	HC
12.3.21	Agreement Change Order 23 – 8/5/15, Simulator Development System (SDS), 64 pages, 8.5 X 11	HC
12.3.22	Agreement Change Order 24 – 8/20/15, 94 pages, 8.5 X 11	HC
12.5	Field Fabrication and Installation Specification, 3.9 Installation of Spool Pieces and Field Fabricated Piping/Training, 6 pages, 8.5 X 11	HC
12.5.1	Piping Isometric General Notes, Dwg. No. APP-GW-P_W-100, 1 page, 11 X 17	HC

Table A-1. Documents Reviewed During the Assessment		
No.	Description	Hard Copy (HC) or Electronic (E)
12.5.2	Piping Isometric Symbol Legend, Dwg No. APP-GW-PLW-102, 1 page, 11 X 17	HC
12.5.3	Shield Building Steel Wall Panels EL 100'-0" to 248'-6 1/2" General Notes, Sheet 1 & 2, 11 X 17	HC
12.5.4	AP1000 Structural Modules General Notes Dwg No. APP-GW-S9-100 through 107, 7 pages, size 11X17	HC
12.5.5	General Notes Mechanical Modules (Dwg No. APP-GW-K9-100 through 103, 4 pages, size 11X17	HC
12.9	Westinghouse Home Office Engineers not charging/charging VC Summer Project, 1 page, size 8.5 X 11	HC
12.9.1	CB&I Total Head Count for Design Engineering and Support, 1 page, size 8.5 X 11	HC
12.10	Historical and Open E&CDRs and N&Ds, 4 pages, size 8.5 X 11	HC
12.13	Clives CGD Submittal Review Status, 1 page, 8.5 X 11	HC
12.15	Site Overall Total, Direct Construction Only (Planned and Earned Hours) curve, 1 page, 11X17	HC
12.17	VC Summer Total Steel Commodity, 7 pages, 11X17	HC
12.21	CB&I Direct Construction Labor Summary, dated May, 2015, 1 page, 11X17	HC
12.23	Available Work Assuming No Manpower Constraints (table), 1 page, 8.5 X 11	HC
12.24	VC Summer Initial Test Program Unit 2 & 3, Target Completion Schedule, 1 page, 11X17	HC
12.26	EBS_NND_Daily Active Detail, 7 pages, 8.5 X 11	HC
12.28	ROS Impacts Report, 6 pages, 11X17	HC
12.29	Engineering Impacts Report, 1 pages, 8.5 X 11	HC
13.1	Westinghouse Engineering Remaining Schedule (2015-09-28), 135 pages, 8.5 X 11	HC
13.7	WEC PO Status report, 1 page, 8.5 X 11	HC
13.9	Corrective Action Program Status (CAPS) Report, dated 9/17/15, 19 pages, 8.5 X 11	HC
14.2	Indirect Cost Review, 22 pages, 8.5 X 11	HC
14.3	Indirect/direct hours Week Ending 08-16-15 (Indirect Labor Report), 4 pages, 8.5 X 11	HC
15.6	Summary of the key engineering activities in the ECS remaining in the schedule that have a tie to construction, 1 page, 8.5 X 11	HC
15.6.1	Post-Engineering Design Closure Work Streams, 1 page, 8.5 X 11	HC
15.6.2	Engineering Items – ROYG (2015 – 09-28), pages 1 – 70, 11X17	HC
15.6.3	Procurement Items – ROYG (2015-09-28) pages 1-128, 11X17	HC
15.6.4	Licensing Items - ROYG (2015-09-28) pages 1-12, 11X17	HC
15.7	Engineering Resources, 1 page, 8.5 X 11	HC

Table A-1. Documents Reviewed During the Assessment		
No.	Description	Hard Copy (HC) or Electronic (E)
15.9	VC Summer Discussion on I&C Schedule & PRS – July 2015, 10 pages	HC
15.9.1	I&C Baseline 8 Engineering Remaining, 51 pages, 8.5 X 11	HC
15.11	Annex Building Cable Tray Plan Area EL 100' – 0", Sheet 2 of 2, Dwg No. APP4031-ER-013, 1 page, 11X17	HC
15.11.1	Annex Building Cable Tray Support Location Plan Area 1 & Area 4 EL 100' – 0" Sheet 2 of 3, Dwg No. APP4031-SH-014, 1 page, 11X17	HC
15.11.2	Annex Building Cable Tray Support List & Fabrication Details Area 1, EL 100'-0" Sh 1 of 3 Dwg No. APP-4031-SHX-01201, 1 page, 11X17	HC
15.11.3	Annex Building Cable Tray Support List & Fabrication Details Area 1, EL 100'-0" Sh 2 of 3, Dwg No. APP-4031-SHX-01301 1 page, 11X17	HC
15.11.4	Annex Building Cable Tray Support List & Fabrication Details Area 1, EL 100'-0" Sh 3 of 3, Dwg No. APP-4031-SHX-01401 1 page, 11X17	HC
15.11.5	Fabrication Requirements Cope Tray Supports Seismic Category III, Trapeze Rod Support Detail, Dwg No. APP-SH27-VF-201, 1 page, 11X17	HC
15.11.6	Annex Building – Area 4 Structural Steel Roof Supplemental Steel Plan, Dwg No. AP-4044-SS-005, 1 page, 11X17	HC
15.13	Remaining Hold DDs, 37 pages, 1 page 8.5 X 11, 36 pages 11 X 17	HC
15.13 – 15.14	Hold Docs missing DD, 3 pages, 11 X 17	HC
15.16	CB&I Remaining Equipment Deliveries, 100 pages, 11X17	HC
15.16.1	Westinghouse Remaining Equipment Deliveries, 17 pages, 11X17	HC
16.1 – 16.6	List – Construction Package – On Hold, 3 pages, 11X17	HC
16.1 – 16.6.1	VC Summer Unit -2 Auxiliary Building Room Plan 12306, Strategic Planning Team September 14, 2015 (DRAFT), dated 9/14/15, 13 pages, 8.5 X 11	HC
16.1 – 16.6.2	Email (fr James B. Kelly to Con Matthews dated 9/24/15, Subject: Drawings required for Electrical cable tray supports with APP-GW-GBH-451, Rev 0, AP1000 Standard Plant Engineering Document List – Annex Building Areas 1, 2, 3 – Raceways and Supports Construction Deliverables – Elevation 100' to 117'6" (AN2-RC-X) 15 pages, 8.5 X 11	HC
16.1 – 16.6.3	Annex Building Cable Tray Plan Area 1 El. 100' -0" Sheets 1 of 3, Dwg No. APP-4031-ER-012, 1 page 11X17	HC
16.1 – 16.6.4	Liquid Radwaste System, Auxiliary Building Room 12259, Annulus Pipe Chase, Dwg No. APP-WLS-PLW-451, 1 page, 11X17	HC
16.1 – 16.6	Pipe Support Drawing WLS System, Dwg No. APP-WLS-PH-12R00891, 1 page, 11X17	HC
16.1 – 16.6.5	Shield Building Lower Annulus Inside Embedments Development View Radius 69'-6" (Sheet 1), Dwg No. APP-1020-CE-100, 1 page, 11X17	HC
16.1 –	Shield Building Lower Annulus Inside Embedments Index Develop-	HC

Table A-1. Documents Reviewed During the Assessment		
No.	Description	Hard Copy (HC) or Electronic (E)
16.6.6	ment View Radius 69'-6" (Sheet 1), Dwg No APP-1020-CEX-100, 1 page, 11X17	
16.1 – 16.6.7	Shield Building Lower Annulus Inside Embedments Index Development View Radius 69'-6" (Sheet 2), Dwg No APP-1020-CEX-102, 1 page, 11X17	HC
16.1 – 16.6.8	Shield Building Lower Annulus Inside Embedments Index Development View Radius 69'-6" (Sheet 4), Dwg No APP-1020-CEX-104, 1 page, 11X17	HC
16.1 – 16.6.9	Standard Embedment Plates Deformed Wire Anchor (DWA) Type, Dwg No APP-CE01-CE-002, 1 page, 11X17	HC
16.2/3	Overall Modules Response status, 11 pages, 8.5 X 11	HC
16.10	RBL (APP), RBL (CPP), Support Qualification, # Supports Qualified by month, 2 pages, 8.5 X 11	HC
17.2	VCS Unit 2 – Construction T/O to Component Test (Waterfall), 13 pages, size 8.5 X 11	HC
17.2.1	VCS Unit 1 - Service Water – Service Water Initial Test Program, 1 page, size 11 X 17	HC
17.3	EDCR Listing – from 4/30/15 to 10/1/2015, 10 pages, 8.5 X 11	HC
17.3.1	CBI EDCR Listing - pages 1 to 108, 8.5 X 11	HC
17.4	WEC – CBI Staffing Summary Table, 1 page, 8.5 X 11	HC
17.5 (2.9)	Weekly ECS Report Out, 9/30/15, 48 pages, 8.5 X 11	HC
17.6	Monthly Engineering Completion Status Meeting, September 9 th , 2015, 22 pages, PowerPoint, size 8.5 X 11	HC
17.6.1	Monthly Engineering Completion Status Meeting, October 7, 2015, 24 pages, PowerPoint, size 8.5 X 11	HC
17.7 (2.3)	Level 1 Issue Executive Summary Report, 2 pages, 8.5 X 11	HC
17.8	CB&I 1X4 POs Released, 3 pages,	HC
17.9	CBI To-Go POs, 1 page, 8.5 X 11	HC
17.10	Standard Plant ITAAC 2.3 06.09b.iv Performance Documentation Plan (Doc. No. APP-RNS-ITH-004), 11 pages, size 8.5 X 11	HC
17.10.1	Standard Plant ITAAC 2.2 02.02a Performance Documentation Plan (Doc. No. APP-PCS-ITH-014), 13 pages, size 8.5 X 11	HC
17.10.2	Standard Plant ITAAC 2.1 02.11b.iii Performance and Documentation Plan (Doc No APP-RCS-ITH-048), 12 pages, size 8.5 X 11	HC
17.10.3	Standard Plant ITAAC 2.1 02.08b Performance and Documentation Plan (Doc No APP-RCS-ITH-056), 13 pages, size 8.5 X 11	HC
17.10.4	Standard Plant ITAAC 2.1 02.08d.vii Performance and Documentation Plan (Doc No APP-RCS-ITH-060), 10 pages, size 8.5 X 11	HC
19.2	Work Package Review Task Team, 3 pages, 8.5 X 11	HC

Table A-1. Documents Reviewed During the Assessment		
No.	Description	Hard Copy (HC) or Electronic (E)
--	CBI AP1000 Strategic Planning Team – Unincorporated DCP Report, 5 pages, 8.5 X 11	HC
--	VCS Monthly Project Review Meeting, September 17, 2015, 156 pages, PowerPoint 8.5 X 11	HC
--	VCS Site Design Engineering Drawing Booklet (1), System P&IDs & Electrical One-lines, 321 pages, 11X17	HC
--	VCS Plan of the Day - 9-9-15, 35 pages	E
--	VC Summer Units 2 & 3 Project Assessment Consortium Meeting (Presentation), dated 9/9/15, (2 Copies), 131 pages, PowerPoint 8.5 X 11	HC
--	VC Summer Nuclear Station Units 2 and 3 Updated Final Safety Analysis Report , Chapter 1 (Rev 3) 8.5 X 11 (Large packet)	HC
--	VC Summer – Site Specific Engineering Schedule – Remaining (Sorted by System /Major Sequence) Data Date: 28-Sep-15, CB&I – 200 pages, 11X17	HC
--	AP1000 Domestic Design Finalization – CBI Std Plant – DOM DF – To GO Engineering, 157 pages, 11X17	HC
--	E&DCR Title: Requalification of KOPEC conduit supports at Elevation 66'-6" Area 2, E&DCR No. APP-1212-GEF-087, Rev 0., 25 pages, 8.5 X 11	HC
--	VC Summer Nuclear Station Units 2 and 3 Updated Final Safety Analysis Report , Chapter 3 (Rev 3) , 8.5 X 11 (Large packet)	HC
--	VCS Schedule - WEC PM Milestones, 4 pages	E
--	VCS Schedule - WEC PM Milestones, 6 pages	E
--	VCS Schedule - Module Assembly Summary, 1 page	E
--	VCS Schedule – Licensing, 44 page	E
--	VCS Schedule - ITAAC Detail, 137 pages	E
--	VCS Level 1 – Construction Schedule, 3 pages	E
--	VCS Schedule - Module Procurement Detail, 8/25/15, 55 pages	E
--	VCS Schedule - Module Procurement Summary, 8/25/15, 6 pages	E
--	VCS Schedule - Module Procurement, 51 pages	E
--	VCS Schedule - NAC Detail, 8/30/15, 40 pages	E
--	VCS Schedule - NAC Summary, 2 pages	E
--	VCS Schedule – NAC, 8/30/15, 53 pages	E
--	VCS Schedule - Panel Delivery Detail, 26 pages	E
--	VCS Schedule - Panel Delivery Summary, 8/25/15, 2 pages	E
--	VCS Schedule - Panel Delivery, 8/25/15, 26 pages	E
--	VCS Schedule - Procurement Detail, 8/25/15, 323 pages	E
--	VCS Schedule - Procurement Summary, 8/25/15, 9 pages	E
--	VCS Schedule - Procurement WES Detail, 8/25/15, 158 pages	E

Table A-1. Documents Reviewed During the Assessment		
No.	Description	Hard Copy (HC) or Electronic (E)
--	VCS Schedule - Procurement WES Summary, 8/25/15, 12 pages	E
--	VCS Schedule - Procurement WES, 127 pages	E
--	VCS Schedule - Procurement, 261 pages	E
--	VC Summer EPC Agreement, 5/23/15, 176 pages	E
--	Meeting Sign in, Consortium 9-9-15 Presentation, 3 pages	E
--	September 9 Presentation Draft Agenda, 2 pages	E
--	CBI Meeting Schedule - 9-9-15, 3 pages	E
--	Weekly Site Safety Units 2 and 3 Report 9-21-15 28 pages	E
--	VCSummer Supply Chain Management Org Chart 9-21-15, 1 page	E
--	VCSumer Plan of the Day 9-21-15, 26 pages	E
--	Turbine Building Pipe Summary - Large and Small Bore 1-3-12, 1 page	E
--	Backfill Plan for Nuclear Island, 2 pages	E
--	Aux Building Elevations, 20 pages	E
--	9-21-15 Module Discussion Attendance Sheet, 9/21/15, 1 page	E
--	VCS Modules Meeting - 9-15-15, 154 pages	E
--	4-Box Report - Modules - 9-15-15, 42 pages	E
--	VC Summer Plan of the Day 9-22-15, 36 pages	E
--	VC Summer P6 database structure, 1 page	E
--	VC Summer P6 Info, 12 pages	E
--	SCEG Personnel Reporting Up Through Ron Jones, 2 pages	E
--	Construction Performance Meeting 9-13-15, 31 pages	E
--	Org Chart - Confidential - Do Not Share Outside Bechtel, 1 page	E
--	9-14-15 LAR 30 & LAR 111 Schedule, 4 pages	E
--	9-15-15 McIntyre Email on CAP and DCP Status, 2 pages	E
--	9-15-15 ITAAC Letter, 3 pages	E
--	9-17-15 U3 Overview Schedule, 1 page	E
--	9-17-15 U2 Overview Schedule, 1 page	E
--	9-17-15 Monthly Meeting Action Items List, 19 pages	E
--	9-17-15 Monthly Meeting Agenda, 1 page	E
--	2015 09 22 - Bechtel Assessment - Document Request - Tracking Document, 17 pages	E
--	2015 09 22 - Bechtel Assessment - Document Request - Tracking Document (3), 17 pages	E
--	2015 09 04 - Bechtel Assessment - Document Request - Tracking Document-Rev 1 - SG, 17 pages	E
--	2015 08 24 - Bechtel Assessment - Document Request - Tracking Document, 12 pages	E

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Table A-1. Documents Reviewed During the Assessment		
No.	Description	Hard Copy (HC) or Electronic (E)
--	2015 08 18 - Bechtel Assessment - Document Request - Tracking Document, 11 pages	E
--	Bechtel Assessment of V. C. Summer Units 2 & 3 - 8-12-15 Supplemental Request for Schedule Related Information, 2 pages	E
--	2015 08 03 - Bechtel Assessment - Document Request - 8-7-15 Comments, 16 pages	E
--	VCS Document Request List, 2 pages	E
--	2015 09 23 - Bechtel Assessment - Document Request - Tracking Document, 17 pages	E
--	VC Summer aerial photo taken 6-30-15, 1 page	E
--	WEC Engineering Status Meeting 9-25-15, 1 page	E
--	WEC Engineering Follow-up Meeting 9-28-15, 1 page	E
--	VC Summer Plan of the Day 9-24-15, 38 pages	E
--	Work Control Document Control Mtg 9-24-15, 1 page	E
--	VC Summer Plan of the Day 9-23-15, 35 pages	E
--	VCS Schedule - Bab Follow, 45 pages	E
--	VCS Schedule - Engineering Milestones (Gap file), 123 pages	E
--	VCS Schedule - Fab Follow, 48 pages	E
--	VC Summer aerial phot taken 6-30-15, 1 page	E
--	VCS Module Q240, 2 pages	E
--	VCS Module Q233, 3 pages	E
--	VCS Module CA36, 2 pages	E
--	VCS Modules, 7 pages	E
--	VCS - Ctrmt Elev 084, 116 pages	E
--	VCS - Ctrmt Elev 084 (WBS), 12 pages	E
--	VCS Level 2 - Construction Schedule, 23 pages	E
--	VCS Schedule - Module Assembly Detail, 199 pages	E
--	VCS Schedule - Module Assembly, 8/30/15, 163 pages	E
--	VCS Schedule - Testing & Startup Detail, 1289 pages	E
--	VCS Schedule - Testing & Startup Summary, 8/30/15, 8 pages	E
--	VCS Schedule - Construction Site Prep Summary, 3 pages	E
--	VCS Schedule - Construction Site Prep Detail, 233	E
--	VCS Schedule - Testing & Startup, 8/30/15, 12 pages	E
--	VCS Schedule - Construction Site Prep, 276 pages	E
--	EDCR-Bechtel Request 10-1-15, 10 pages	E
--	EDCR-Bechtel Request 10-1-15, 7 pages	E
--	VC Summer Plan of the Day 10-7-15, 32 pages	E
--	CBI EDCR Report 10/2/2015, 14 pages	E

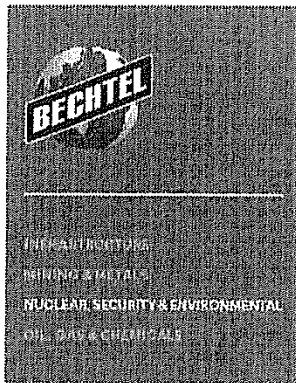
Table A-1. Documents Reviewed During the Assessment		
No.	Description	Hard Copy (HC) or Electronic (E)
--	CBI EDCR Report 10/2/2015, 15 pages	E
--	2015 09 30 - Bechtel Assessment - Document Request - Tracking Document, 9/30/15, 19 pages	E
--	2015 10 02 Rev1 - Bechtel Assessment - Document Request - Tracking Document, 10/2/15, 20 pages	E
--	2015 10 08 - Bechtel Assessment - Document Request - Tracking Document, 10/9/15, 37 pages	E
--	VC Summer Plan of the Day, September 29, 2015, 40 pages, PowerPoint 8.5 X 11	HC
--	Civil Generic Guidance Open Items, 12 pages, 11X17	E
--	Straightening Studs, email, 10-13-15, 5 pages, 8.5 X 11	E
--	Non-manual Turnover Rate, email, 10-12-15, 3 pages, 8.5 X 11	E
--	Email Drawings required for Electrical cable tray support, Kelly to Matthews, 9-24-15	E
--	Annex Building Cable Tray Support Area 1, EL. 100'-0" APP-4031-SH-E002, Dwg No APP-4031-WF-E002	HC
--	Annex Building Cable Tray Support Area 1, EL. 100'-0" APP-4031-SH-E002, Dwg No APP-4031-VF-E900	HC
--	Annex Building Cable Tray Support Location Plan Area 1 & Area 4 EL 100'-0" Sheet 3 of 3, Dwg No APP-4031-SH-014	HC
--	Fabrication Requirements Cope Tray Supports Seismic Category III Trapeze Rod Support Detail, Dwg No APP-SH27-VF-201	HC
--	Annex Building - Area 1 Supplemental Steel Plan @ EL 117'-6", Dwg No APP-4041-SA-002	HC
--	Annex Building Cable Tray Support List & Fabrication Details, Area 1 & Area 4, EL 100'-0" SH 3 of 3, Dwg No APP-4031-SHX-01401	HC
--	Annex Building Cable Tray Support List & Fabrication Details Area 1, EL 100'-0" SH 1 of 3, Dwg No APP-4031-SHX-01201	HC
--	Annex Building Cable Tray Support List & Fabrication Details Area 1, EL. 100'-0" SH 2 of 3, Dwg No APP-4031-SHX-01301	HC
--	Annex Building - Area 1 Supplemental Steel Plan @ EL. 117'-6", Dwg No APP-4041-SA-001, 1 page,	HC
--	Annex Building - Area 4 Structural Steel Roof Framing Plan Elevation 117'-1 1/2" (LP), Dwg No APP-4044-SS-001, Dwg No APP-4044-SS-001	HC
--	Annex Building - Area 1 Steel Framing Plan @ EL. 117'-6", Dwg No APP-4041-SS-001, 1 page, 11X17	HC
--	CBI Daily Force Report, 10/12/2015, 1 page, 8.5 X 11	E
--	CBI Daily Report, 10/12/2015, 3 pages, 8.5 X 11	E
--	VC Summer Plan of the Day, October 13, 2015, 33 pages, 8.5 X 11	E
--	Document Complexity N-Type EDCRs 10-15-15, 2 pages, 8.5X11	E

Appendix B

Assessment Team Resumes

PRIVILEGED MATERIAL

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Richard L. Miller

Manager of Operations

Assessment Team Leader



Technical Qualifications

- Senior Reactor Operator's License No 20411

Education

- Executive Management Certificate, Vanderbilt University
- B.S., Mechanical Engineering, North Carolina State University

Memberships

- Member, American Nuclear Society Board, Operations and Power Division
- Member, American Nuclear Society

Dick Miller is a degreed mechanical engineer with over 38 years of nuclear engineering, construction, and project management experience. Currently he is the Operations Manager for Nuclear Power, responsible for the successful execution of Bechtel's nuclear power projects worldwide, as well as leading a senior executive team performing an assessment of the status of the V.C. Summer Units 2 & 3 new builds. He has unparalleled experience as a project manager, overseeing numerous highly successful Steam Generator and Reactor Pressure Vessel Replacement (SGR/RPVHR) projects, including the world record for shortest duration at Comanche Peak Unit 1 and the Ginna SGR, which was the first to use the "through-the-dome" methodology. He is an enthusiastic, committed leader who focuses on providing executive oversight, technical guidance for the successful planning and implementation of projects, and close collaboration between clients and Bechtel to ensure project success. Prior to joining Bechtel, Dick worked for a southeast electric utility at one of the company's nuclear power plants, holding a senior reactor operator's license and managing the utility's maintenance department. Since joining Bechtel, Dick has spent the majority of his career on field assignments across the United States, managing or directing over 20 major modification projects at nuclear power facilities.

Manager of Operations, Nuclear Power

2014-Present: Mr. Miller is responsible for all nuclear projects and services worldwide, as well as the development of new opportunities both domestic and foreign, including the completion of Watts Bar Unit 2 and the Davis-Besse SGR and Wolf Creek Pipe Replacement projects, as well as the commencement of the Beaver Valley Unit 2 SGR. Currently, he is leading a senior executive team performing an assessment study of the status, challenges, and opportunities of the new build AP1000 units at V.C. Summer for the owner.

Senior Project Director, Nuclear Power, Bechtel Power Corporation

2011-2014: Mr. Miller was responsible for the successful implementation of nuclear power projects, including the NextEra EPU's, as well as proposal development and client communications. He also managed Bechtel's efforts related to the Fukushima incident, including staffing and sponsorship of Bechtel employees on the Fukushima Industry Support Team in Tokyo and representation of Bechtel in Tokyo during business development efforts. In addition, he oversaw the Crystal River Unit 3 Containment Repair Project, including management of the Phase 1 engineering and development effort and EPC contract negotiations.

Senior Project Director/Project Manager, SONGS SGR, Bechtel Power Corp.

2010-2011: Mr. Miller was responsible for the successful completion of the SONGS Unit 3 lump-sum SGR, which was completed within budget and ahead of schedule.

Senior Project Director, Nuclear Power, Bechtel Power Corp.

2007-2010: Mr. Miller was responsible for proposal development activities and contract negotiations for numerous SGR, RPVHR, and EPU projects. Significantly, he oversaw the negotiation and implementation of the NextEra Fleet EPU Project, a major multi-billion dollar effort to perform EPUs on six units (Point Beach 1 & 2, St. Lucie 1 & 2, and Turkey Point 3 & 4). This project earned the Business Development Project of the Year Award for the entire Bechtel Corporation.

Senior Project Manager, Beaver Valley Unit 1 SGR/RPVHR and Comanche Peak Unit 1 SGR, Bechtel Power Corp.

2004-2007: Mr. Miller was responsible for the successful completion of the SGR/RPVHR project for FirstEnergy's Beaver Valley Unit 1. This project was named runner-up for Pennwell's Project of the Year at

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Richard L. Miller

the Power Generation Conference. As PM for Comanche Peak Unit 1, he led the team that set the world record for shortest schedule of a SGR, and this project was named runner-up for Bechtel's Project of the Year.

Senior Project Manager, Davis-Besse, North Anna, and Surry RPVHAs, Bechtel Power Corp.

2002-2003: Mr. Miller was responsible for the successful execution of head replacement projects at North Anna Units 1 and 2, Surry Units 1 and 2, and Davis-Besse.

Operations Manager, Nuclear Power, Bechtel Power Corp.

2000-2002: Mr. Miller was responsible for the major modification operations of Bechtel's nuclear power business line, and he oversaw the successful completion of the Kewaunee and South Texas Project Unit 2 SGRs. In addition, during this time he took over as Project Manager to complete the D.C. Cook SGR. He was also responsible for the completion of the commercial closeout of the Arkansas Nuclear One Unit 1 SGR.

Manager of Decommissioning, Bechtel Power Corp.

1998-2000: Mr. Miller was responsible for the decontamination and decommissioning business line activities, including Connecticut Yankee and SONGS 1 Large Component Removal.

Project Manager, Tihange Unit 3 SGR

1997-1998: Mr. Miller was responsible, as a self-employed project management consultant, for the management of the Tihange SGR in Belgium.

Project Manager, LaSalle Modifications, Bechtel Power Corp.

1996-1997: Mr. Miller was responsible for the management and installation of modifications at the LaSalle nuclear plant.

Project Manager, Ginna SGR, Bechtel Power Corp.

1993-1996: Mr. Miller was responsible for the management and implementation of the lump sum EPC contract for Ginna's SGR. Additionally, he served as Proposal Manager for several lump sum SGR and major modification proposals.

Project Manager, North Anna Unit 1 SGR, Bechtel Power Corp.

1990-1993: Mr. Miller was responsible for the management and implementation of the lump sum EPC contract for North Anna 1's SGR.

Deputy Project Manager, Indian Point Unit 3 SGR, Bechtel Power Corp. and Manager, Bechtel-KWU Alliance

1988-1990: Mr. Miller assisted the implementation of the Indian Point 3 SGR, as well as prepared proposals and managed awarded conceptual studies for other SGRs and major modifications. Additionally, he was responsible for the Bechtel-KWU Alliance activities.

Senior Reactor Operator/Maintenance Supervisor/Principal Engineer, H.B. Robinson Nuclear Power Plant

1979-1988: Mr. Miller served as Principal Engineer at H.B. Robinson, during which time a SGR was performed, as well as serving as Outage Manager for refueling outages and Maintenance Supervisor for mechanical maintenance. Additionally, he received his Senior Reactor Operator License and authored the Outage Management Manual, the nuclear industry's first, which received an INPO Good Practice award.

Field Service Engineer, Westinghouse Electric Corp.

1977-1979: Mr. Miller was responsible for the erection and inspection of equipment at numerous nuclear power plants under construction.

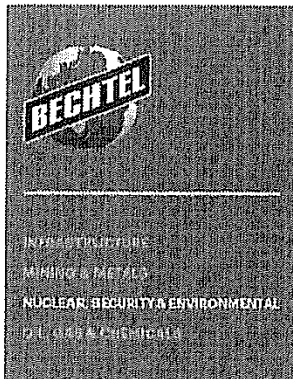
U.S. Marine Corps, E-5

1971-1973: Mr. Miller received an honorable discharge in 1973.

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Carl W. Rau

Executive Sponsor



Education

- AA, Civil Engineering, Penn State University
- Certificate, Business Management, California Coast University

Over his 44 year Bechtel career, Carl has served various business lines and corporate functions in project management and executive leadership roles. He is a true leader with unmatched mega-project construction experience that ranges from nuclear power plants to industrial facilities. He also brings an international perspective from his roles overseeing projects around the globe, as well as a thorough understanding of the commercial aspects of large project development and execution. Additionally, he has a broad knowledge of effective and proven processes and procedures, along with a unique ability to motivate those around him.

Manager, Special Projects, Bechtel

2012-2015: Mr. Rau served in an executive position leading specialized projects and studies in support of Bechtel's Nuclear, Security, and Environmental and Infrastructure global business units.

President, Nuclear Power

2008-2012: Mr. Rau led the Nuclear Power business line, managing all of Bechtel's global nuclear power activities, including project development, execution, and services. During his tenure, he oversaw numerous project awards and successful executions which significantly grew the nuclear power portfolio, including extended power uprates on six units, steam generator replacements, Watts Bar Unit 2 completion, engineering services at multiple plants, and permitting, licensing, and design for advanced reactor projects.

Manager of EPC Functions, Bechtel Group

2006-2008: Mr. Rau was responsible for all the functional departments of the Bechtel group of companies, ensuring that all world-wide projects and corporate functions were appropriately staffed and processes / procedures were followed.

Executive Vice President - London Operations for Oil, Gas & Chemicals (OG&C)

2005-2006: In this capacity, Mr. Rau oversaw OG&C's London office and Center of Excellence, which was responsible for executing, deploying personnel, and providing technical support for the OG&C global business unit's operations in Europe, Africa, the Middle East, and Asia.

President, Bechtel Infrastructure Corporation (BINFRA)

2004-2006: As BINFRA President, Mr. Rau was responsible for planning, executing, and managing civil infrastructure projects in North and South America, supporting both public and private sector customers.

Executive Vice President, Bechtel Systems & Infrastructure, Inc. (BSII)

2003-2004: Mr. Rau was responsible for the oversight of Bechtel's U.S. Government business, primarily with the Department of Energy and the Department of Defense, specializing in large, complex projects in the areas of defense, space, energy, national security, and the environment.

Manager of Central Functions, Bechtel Group

2002-2003: Mr. Rau was responsible for all the functional departments of the Bechtel group of companies, ensuring that all world-wide projects and corporate functions were appropriately staffed and processes / procedures were followed.

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Carl W. Rau

Frederick Execution Unit Manager, Bechtel Power and BSI

2000-2002: Mr. Rau was responsible for all personnel at the Frederick, Maryland Execution Unit office and Center of Excellence, which was responsible for winning and executing work for both the power and government services business units. In 2000, he was elected Senior Vice President.

Corporate Manager of Construction and President of Bechtel Construction Operations Incorporated (BCOI)

1999-2000: Mr. Rau was responsible for all construction personnel world-wide in the Bechtel group of companies, as well as construction execution through BCOI.

Manager of Operations, Europe, Africa, and Middle East

1998-1999: In this capacity, Mr. Rau ensured the effective execution of all Bechtel projects underway in Europe, Africa, and the Middle East, as well as providing support for Bechtel businesses and business development efforts.

Project Director, Dabhol Power Station Project

1999-1999: During his tenure as Manager of Operations, Mr. Rau served as the Project Director for the Bechtel/GE consortium that performed EPCS services for this 2,240 MW combined cycle power project in India (at the time the largest foreign investment in India).

Project Director, Jamnagar Refinery Project

1997-1998: Mr. Rau led the effort to design, build, and commission this massive refinery complex (the largest in the world), which covers 7,500 acres and consists of manufacturing and allied facilities, utilities, off-sites, port facilities, and housing for 2,500 employees. In 1998, he was elected a Principal Vice President.

Manager of Power Operations, Europe, Africa, and Middle East

1996-1997: Mr. Rau ensured the effective execution of all Bechtel power projects underway in Europe, Africa, and the Middle East, as well as providing support for Bechtel businesses and business development efforts.

Executive Assistant to the President, Bechtel Power

1994-1996: Mr. Rau supported the President of Bechtel Power to ensure the effective execution of projects, handling both technical and commercial issues, as well as business development efforts and customer engagement.

Manager of Power Operations, South Korea

1993-1994: Mr. Rau ensured the effective execution of all Bechtel power projects underway in South Korea, as well as providing support for Bechtel businesses and business development efforts.

Project Manager, Comanche Peak 1 & 2 Completion Project

1989-1993: Mr. Rau began as the Project Completion Manager of Comanche Peak 1 nuclear power station, which Bechtel took over from the previous contractor who had failed to complete the project. He was then seconded to the utility owner's organization and was responsible for planning and executing the Unit 2 completion. He successfully led both units to completion, as well as serving as an expert witness for Unit 2 rate case on behalf of the utility.

Mechanical Discipline Manager/Project Completion Manager, Vogtle Nuclear Generating Station

1985-1989: Mr. Rau was responsible for all mechanical work, including management of contractors. This included responsibility for piping, reactor internals, insulation, turbine erection, and fire protection system installation. He supervised a Georgia Power mechanical discipline organization of 2,000 non-manual employees and functioned as Bechtel's senior construction representative responsible for 100+ construction engineers in all disciplines.

Various Field Roles, Nuclear Power Projects

1971-1985: Mr. Rau served in a variety of nuclear power plant construction field roles for Bechtel, including:

- * System Completion Manager/Lead Piping Superintendent/Drywell CRD Area Superintendent/HVAC Coordinator — Hope Creek Generating Station
- * Lead Piping Superintendent/Piping Superintendent/Assistant Project Field Engineer/Startup Superintendent/Lead Piping/Mechanical Engineer/Area III Lead Piping Engineer — Susquehanna Steam Electric Station
- * Civil Field Engineer — Calvert Cliffs Nuclear Power Plant

Construction Engineer, U.S. Steel Corporation

1968-1971: Mr. Rau served as the survey crew party chief responsible for all field control and construction surveys, as well as a field engineer responsible for all aspects of construction at the soaking facility.

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Ronald L. Beck

Project Manager (Engineering and Construction)

Technical Qualifications

- Over 43 years of nuclear experience, including 17 in design engineering and licensing, 18 on SGR and RVHR projects, and 5 in next-generation nuclear (EPR, SMR) project management
- Registered Professional Engineer in Maryland (retired); inactive in Mississippi, South Carolina, Tennessee, Texas, and Virginia
- Member of ASCE, ASME
- Author of several published technical papers (available on request)

Education

- ME, Civil Engineering, Virginia Polytechnic Institute (Structural Engineering Major)
- BS, Civil Engineering, Virginia Polytechnic Institute
- Bechtel Certification, Project Manager Level II

Ron Beck has spent his entire career in the nuclear power industry. He has a strong civil engineering background and many years of design engineering and field experience, with a solid foundation in the details of work planning and execution. He was project manager for three steam generator replacement (SGR) projects, assistant project manager for one SGR project, and shift outage manager for two reactor vessel head replacement (RVHR) projects. His background also includes civil design work on Grand Gulf, South Texas Project, and Watts Bar. He is a highly dedicated leader with strong technical skills, effective management capabilities, and the ability to motivate teams to successful outcomes.

Project Manager, Generation mPower Small Modular Reactor

2011–Present: For the Generation mPower (GmP) small modular reactor (SMR) project, Mr. Beck has been responsible for all aspects of Bechtel's scope and project execution and for interface with Generation mPower LLC and Babcock & Wilcox (B&W), as well as potential customers, Industry Advisory Council members, management committee members, and regulatory agencies. His responsibilities include overall management of 230+ professionals, including engineering, licensing, project cost and schedule, procurement and contract functions.

Project Engineering Manager, Generation mPower Small Modular Reactor

2010: For the GmP project, Mr. Beck managed the Bechtel engineering team and the integration of Bechtel's scope with B&W's Nuclear Island scope.

Project Manager, Various Commercial Nuclear Projects

2010: Mr. Beck participated in a due diligence assessment as project manager, civil/structural reviewer, construction reviewer, and overall report preparer. The report outlined the results of the assessment regarding investing in a specific new generation nuclear technology.

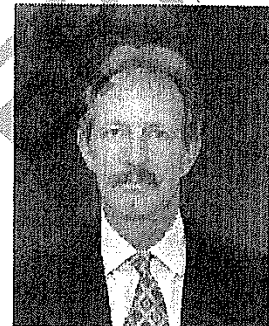
2008–2010: Mr. Beck was the responsible project manager for the Bell Bend US EPR nuclear power plant project. He supported AREVA's preparation of responses to the NRC's requests for additional information in conjunction with the design certification process; managed an optimization study; participated in construction schedule development; worked with customer on updating the site utilities plot plan for its Combined License application; and oversaw the development of budgets, schedules, and reports.

2008: Mr. Beck oversaw the development of the long-range strategic plan for the SONGS SGR project. The work involved developing the pre-outage schedule encompassing Bechtel's work from 2008 through 2010 and the Cycle 15 and Cycle 16 (SGR) outage schedules for Bechtel's work and integrating these schedules into the client's online and outage work schedules.

2007: For the Palo Verde Nuclear Generating Station Unit 1 SGR project, Mr. Beck managed all aspects of removing and relocating the V651 valve in the reactor coolant system ASME Class 1 shutdown cooling line to support long-term plant operability and reliability.

2006–2007: As plan coordinator for the SONGS SGR project, Mr. Beck managed the development and submittal to the client of 50-plus management, engineering, and construction plans and 30-plus specific contract deliverables describing the methods and approaches Bechtel would employ to execute its SGR work scope. He also supported the project manager on project commercial and technical issues.

2005: For the Palo Verde Unit 3 SGR project, Mr. Beck managed the installation of a vortex elimination plate in the reactor coolant system ASME Class 1 shutdown cooling line. The plate was later removed as a result of system testing.



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Ronald L. Beck

2004-2005: Mr. Beck managed or supported proposals for the Turkey Point Units 3 and 4 and St. Lucie Units 1 and 2 RVHR projects; the Crystal River Unit 3 SGR project; the Bruce A Units 1, 2, 3, and 4 SGR projects; the Diablo Canyon Units 1 and 2 SGR projects; the SONGS Units 3 and 4 SGR projects; the SONGS Units 2 and 3 and Palo Verde Units 1, 2, and 3 RVHR studies; and the Palisades RVHR project.

Shift Outage Manager, Surry Unit 1 Reactor Pressure Vessel Head Replacement (RPVHR)

2003: For the Surry Power Station Units 1 and 2 RPVHR project, Mr. Beck interfaced with client, subcontractor, and Bechtel personnel to develop the schedule; attended client/Bechtel plan-of-the-day meetings, interfaced with client and Bechtel personnel on day-to-day operations, including action item meetings and task reviews; and managed Bechtel's day shift containment work during each unit's replacement outages.

Project Manager, Various Steam Generator and Reactor Pressure Vessel Head Replacements

2002: Mr. Beck managed several SGR project proposals, an RPVHR project study for two nuclear units, and an independent third-party SGR project cost estimate study review for a nuclear utility.

1996-2001: For the South Texas Unit 1 (1996-2000) and Shearon Harris (2000-2001) SGR projects, Mr. Beck had the same duties as for the V.C. Summer SGR project.

1995-1996: Mr. Beck developed generic SGR project core team operations and was a member of the team that developed a Bechtel/Westinghouse learning agreement for SGR projects. He also developed competitively bid SGR projects and sole-source negotiated SGR awards, including the first South Texas Unit 1 SGR involving the Bechtel/Westinghouse agreement.

1992-1994: For the V.C. Summer SGR project, Mr. Beck directed all aspects of engineering, construction, procurement, quality assurance, fixed price cos, and schedule management and subcontractor interface; coordinated interfaces with the client and interfaced with Bechtel senior management, global and regional industry unit and execution unit management, and home office functional departments. During the SGR outage, Mr. Beck oversaw all aspects of the on-site construction activities and managed the development of the Bechtel portion of the outage schedule.

1991-1992: For the ASCO Units 1 and 2 SGR project, Mr. Beck managed photogrammetry and interference walkdowns, the redesign of the biological shield wall, preparation of the technical specification, and technical evaluation of replacement steam generator fabrication proposals. He also managed SGR studies for St. Lucie Unit 1 and for Mitsubishi Heavy Industries, Ltd. in Japan.

Assistant Project Manager, Palisades Steam Generator Replacement Project

1989-1991: For the Palisades SGR project, Mr. Beck provided management overview of the engineering team and management support to the cost and schedule supervisor for schedule and budget control. He assisted in coordinating Bechtel's client interface on licensing and other high priority issues and coordinated the development of the SGR outage schedule with the SGR project team (management, engineering, construction, procurement, subcontractors, and client). As night shift outage coordinator during the replacement outage, he coordinated Bechtel's night shift construction activities with the client and the client's contractors. During job closeout, he assisted the project manager and field services manager with closeout activities, including engineering as-built package completion, contract compliance closeout, outage work activity completion, and licensing and quality assurance review closeout.

Project Engineering Manager, Watts Bar Unit 1

1987-1989: Mr. Beck was the Project Engineering Manager for the Hanger and Analysis Update Program for Watts Bar Nuclear Station Unit 1. In this capacity, he oversaw all design activities associated with the update of the Watts Bar pipe stress analyses and pipe support designs, using a site walkdown team and design teams located in Oak Ridge, TN; Gaithersburg, MD; Houston, TX and San Francisco, CA.

Project Engineer, South Texas Project Completion

1986-1987: For the South Texas Units 1 and 2 project, Mr. Beck supported the civil/structural, pipe stress and pipe support, architectural, and plant design layout discipline design activities. He directly interfaced with the client in completing engineering design, licensing, and engineering assurance activities associated with these disciplines. He also assisted in managing the contractual and legal aspects of the project's main cooling reservoir; coordinated interfaces with the project's constructor and client and Bechtel management; and directed the coordination of engineering activities associated with Unit 1 hot functional testing, including development of engineering hot functional test procedures for thermal and vibration monitoring.

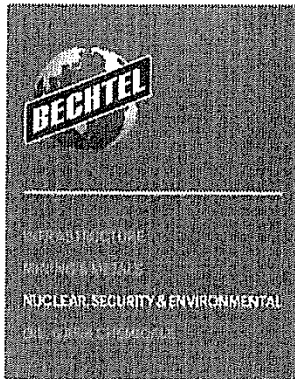
Design Engineer/Group Leader/Engineering Supervisor, Grand Gulf Units 1 & 2

1972-1985: Initially, Mr. Beck developed various preliminary design studies subsequently used for input to the PSAR and to project cost and final design studies. He reviewed cooling tower structural design calculations, wrote and administered a subcontract for cooling tower foundation piling installation, and wrote piping technical specifications. Later he supported various site engineering tasks and completion of final ultimate heat sink basin structural designs and assisted in managing group design activities. Subsequently, he led the design activities associated with the reactor containment building (RCB) and site and managed a specialized task force performing dynamic loading analysis of the BWR Mark III RCB. He supervised development of the FSAR sections associated with the RCB and other Seismic Category I site facilities. He participated in regulatory hearings with the NRC and the Advisory Committee on Reactor Safeguards in conjunction with the RCB dynamic analyses and assisting in supervising civil/structural design activities. Ultimately, he was responsible for all civil/structural engineering design activities associated with Unit 2.

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Jonathon D. Burstein

Project Controls Manager

Education

- M.S., Construction Management, Virginia Tech University
- B.S., Civil Engineering, Virginia Tech University

Jonathon Burstein has over 11 years of cost engineering, planning, and scheduling experience, primarily on nuclear projects throughout the United States. He is well-versed in all aspects of project cost management, including budgeting, monitoring, and controlling cost. He has also developed and maintained project outage construction schedules and monitored critical path. Currently, he is responsible for managing project controls for the Beaver Valley Unit 2 Steam Generator Replacement (SGR) Project and prior to that, he spent 5 years on the Watts Bar 2 Completion Project.



Project Controls Manager, Beaver Valley Unit 2 Steam Generator Replacement Project

2013–Present: Mr. Burstein manages the project controls team to monitor and control cost and schedule for the project, and is part of the project management team to help the Project Manager make informed decisions. Mr. Burstein developed the project controls plan and established tools for successful project execution. He also facilitated cross-training of cost and schedule personnel to further develop their skills. The team is currently managing cost and schedule for the engineering effort, with construction planning and support for Unit 2 outages.

2015: While managing project controls for Beaver Valley, Mr. Burstein also provided planning and cost support to new proposals for nuclear work, steam generator replacement projects, and combined cycle projects. Additionally, he provided planning support to a front-end assessment study for new nuclear construction work.

Construction Cost Supervisor, Watts Bar Unit 2 Completion Project

2012–2013: Mr. Burstein supervised a group of up to 6 employees to manage construction costs. Group responsibilities included: daily craft hours monitoring, weekly QURR reporting and analysis, oversight of quantity reporting database, budget maintenance, trend initiation, and various interfaces with the construction organization. He also continued to perform the financial responsibilities listed below, such as PFSR, CWA's, and project budget monitoring.

Cost Engineer – Financials/Craft, Watts Bar Unit 2 Completion Project

2010–2012: Mr. Burstein monitored the overall financial status of project, generated quarterly contract work authorizations (CWAs) for project funding and quarterly project financial status reports (PFSRs) for management, monitored actual expenditures against the project budget and forecast, and initiated construction trends as identified by cost tools. He generated monthly project reports for functional support to Frederick (project status reports, staffing, and gross margin) and provided other functional support as requested. He also supported craft cost controls as described below.

Cost Engineer – Craft, Watts Bar Unit 2 Completion Project

2008–2010: Mr. Burstein maintained labor cost codes and monitored labor charges in eTrack, maintained budgets and incorporated new work order estimates in ePC Works (a tool for budgeting, monitoring, and controlling all aspects of cost for major Bechtel projects), and performed craft jobhour analysis. In addition, he generated weekly quantity unit rate report (QURR) and other reports as required, created quantity reporting database so that the field engineer could enter weekly quantities, and trained others in use of these systems.

Area Scheduler, Watts Bar Unit 2 Completion Project

2008–2008: Mr. Burstein developed field engineering walkdown schedules and tracking tools and developed and maintained detailed construction schedules. He also acted as interim lead construction scheduler for a period of 2 months.

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Jonathan D. Burstein

Field Planner, Palo Verde Unit 3 Steam Generator Replacement Project

2007-2007: Mr. Burstein developed and maintained project outage construction schedules as the lead planner on day shift. He prepared daily reports for project status, manpower tracking, jobhour earnings, and critical path analysis and trained new planners on SGR scope, planning, and reporting.

Field Planner, Comanche Peak Steam Generator/Reactor Head Replacement Project

2006-2006: Mr. Burstein developed and maintained project outage construction schedules. Work included coordinating steam generator replacement project work activities, preparing daily reports for project status, manpower tracking, jobhour earnings, and critical path analysis, and he cross-trained with the Cost group on craft staffing, subcontracts, and work breakdown structure (WBS) tracking.

Field Planner, Palo Verde Unit 3 N-1 Outage

2006-2006: Mr. Burstein maintained project outage construction schedules as the backshift planner and assisted in schedule development for the Unit 1 valve modification.

Planner, Comanche Peak Steam Generator/Reactor Head Replacement Project

2006-2006: Mr. Burstein maintained project engineering schedule and developed project pre-outage construction schedule, prepared weekly status reports and monthly engineering progress and performance report (EPPR), assisted various projects with schedule maintenance, and worked part-time with AREVA New-Gen to develop engineering schedules.

Field Planner, Palo Verde Unit 1 Steam Generator Replacement Project

2005-2005: Mr. Burstein participated in vertical slice reviews for schedule development. Maintained project outage construction schedules and monitored critical path.

Planner, Central Planning Group

2005-2005: In this assignment, Mr. Burstein assembled proposal schedules and updated various project schedules as needed.

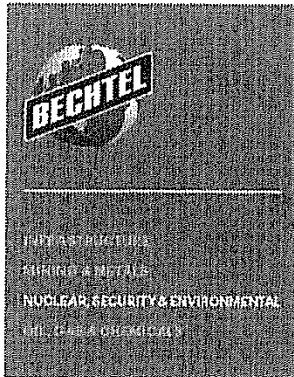
Intern, Miami International Airport Expansion

2004-2004: Mr. Burstein set up and maintained database for tracking and reporting work orders and created project cost and scheduling reports for project management.

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Robert A. Exton

Procurement & Contracts Operations Manager



Technical Qualifications

- Member, Original Lifetime Certified Purchasing Manager, Institute for Supply Management
- Bechtel Certification—Procurement Manager

Education

- B.S., Business Administration with Emphasis in General Management, Humboldt State University
- A.S., Forestry Science, North Dakota State University

Bob Exton, Procurement & Contracts Operations Manager for Nuclear Power, has 37 years of procurement experience working on nuclear, fossil, and telecommunications projects, with over half of that time in the nuclear power generation arena. He has held positions of increasing responsibility in various procurement managerial positions, including material management, purchasing and contracts formation, management, and commercial leadership.

Procurement & Contracts Operations Manager, Nuclear Power

2008–Present: In his current role, Mr. Exton is responsible for managing and monitoring procurement and contracts operations for all commercial nuclear projects. His main focus the past year has been the functional oversight of ongoing nuclear projects and proposal efforts, drawing upon past experience, lessons learned, and the Six Sigma philosophy. Additional focus has been on process improvement and procedures directly associated with commercial nuclear activity.

Program Procurement Manager and Deputy Program Procurement Manager, Cingular Wireless Project and the AWS Project

2002–2008: Mr. Exton was responsible for the procurement operations of these telecommunication projects, focusing on Materials Management. He was also responsible for the integration of the AWS project to the Cingular system and for ongoing procurement operations in support of the nationwide build program. This build program included eight markets with a staff of twenty, including material coordinators and a purchasing group.

Proposal Manager, Power Multi-Project Acquisition Group (MPAG)

2000–2002: Mr. Exton was involved with all proposal efforts for power projects and was the primary representative on project development teams assuring that Procurement supported the development schedule.

MPAG Commercial Lead, Balance of Plant and Electrical

2000–2000: Mr. Exton was responsible for managing and coordinating the buying activities in support of the power projects executed from the Power center of excellence.

Project Procurement Manager, Aleppo, Quezon, and Dabhol Projects/Nuclear Operations

1991–2000: Mr. Exton was responsible for developing, negotiating, and administering purchase orders and subcontracts for three fossil power projects in the Middle East and Asia. On the Aleppo Project, Mr. Exton was responsible for final equipment buyouts, expediting, inspection, traffic and logistics and shipment of remaining equipment and services.

Additionally, was involved in the development of new power plant construction projects.

In his Nuclear Operations role, Mr. Exton was responsible for coordinating procurement activities associated with North Anna Unit 1 SGR, V.C. Summer SGR, and FURNAS project and for the issuance and administration of major lump sum subcontracts.

Senior Contracts/Purchases Supervisor Specialist, Palisades Steam Generator Replacement

1989–1991: Mr. Exton was responsible for negotiating and issuing major lump sum subcontracts and purchase orders.

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Robert A. Exton

Contracts/Purchases Supervisor Specialist, Limerick Nuclear Project

1987-1989: Mr. Exton was responsible for coordinating purchasing activities, administering assigned blanket orders, and supervising closeout of home office contracts and field purchase orders.

Contracts/Purchases Supervisor/Specialist Buyer/Spare Parts Supervisor/Warehouse Receiving Supervisor, Palo Verde Nuclear Project

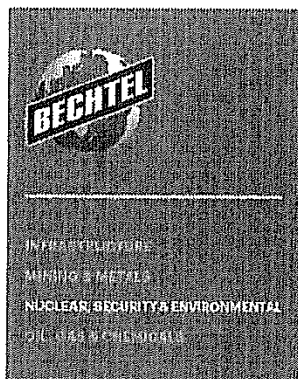
1978-1987: Mr. Exton was responsible for assisting in forecast planning, conducting training on procedures, and reporting progress to the client and engineering.

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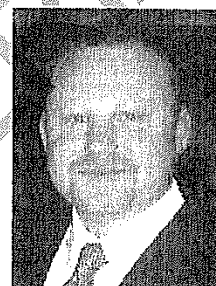
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Jason S. Moore

Project Controls Manager



Education

- B.S., Business Management & Finance, Salisbury State University

Jason Moore has 17 years of project controls experience in the power generation construction industry, with well-rounded expertise in planning, construction, cost, estimating/proposal development, and subcontracts for both nuclear and fossil power plants. For the past 6 years, he has had positions of increasing responsibility on large-scale nuclear power projects, culminating in his current role as Project Controls Manager for Bechtel's on-going engineering services work at Southern Nuclear's three operating nuclear facilities in Georgia and Alabama.

Project Controls Manager, Southern Nuclear Engineering Services Project

2013–Present: Currently, Mr. Moore is responsible for all cost- and schedule-related functions, initiating and implementing project controls tools and programs, and providing technical direction to project controls personnel on this project that provides engineering services to Southern's three operating nuclear plants (Farley, Hatch, and Vogtle).

Project Controls Manager, Wolf Creek Essential Service Water Buried Pipe Replacement Project

2011–2013: Mr. Moore was responsible for all cost- and schedule-related functions, initiating and implementing project controls tools and programs, and providing technical direction to project controls personnel on this project that replaced over 30,000 lineal feet of underground and underwater piping that was deteriorating at the Wolf Creek Nuclear Plant. He provided day-to-day supervision to project controls personnel and interfaced with all functional groups to ensure compliance with execution strategy and objectives. He also provided status information and related analysis to the project manager, project controls operations manager, and project team, as well as interfacing with customers, contractors, and other outside personnel. Additionally, Mr. Moore led specialized studies and provided other specialized support to project and functional management, as required.

Shift Outage Manager/Assistant Project Controls Manager, Turkey Point 3 & 4 Extended Power Uprate Project

2009–2011: While assigned to the Turkey Point EPU project, Mr. Moore held a number of positions of increasing responsibility including:

- Shift Outage Manager—responsible for managing the "team room" for a 43-day outage with a peak craft headcount of 300, reviewing, modifying and driving the project schedule through the nuclear outage, interfacing daily with the plant management team, removing obstacles, and finding quick solutions to daily challenges and issues.
- Assistant Project Controls Manager—responsible for decisions and financial reviews, developing senior management presentation material on multiple occasions for client reviews, chairing multiple client review sessions ranging from trends to Level 3 vertical reviews, personnel management of project, staffing decisions, and employee development, attaining more balanced perspective between the cost and schedule functions, and actively participating in financial development and reviews.
- Planning and Scheduling Supervisor—responsible for providing direct supervision to eight employees, serving as one of the leads driving the U3R25 outage including analysis-based redirection, major recovery planning, and "team room" staffing, developing unique tools to simplify a complex planning project that is now used at all customer project sites.
- Project Planner—Field and Engineering, responsible for presenting the Project Controls status at the Monthly Progress Report to customer senior management, and scheduling lead for all aspects of

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Jason S. Moore

schedule development including engineering, construction, procurement, subcontracts, startup, and customer schedule integration.

- * **Project Estimator**—responsible for developing a plan to provide an estimate to customer for all the EPU projects along with all the templates required to complete the task in a short duration, conducting onsite working sessions/presentations at each of the customer's project sites, in which Level 1.5 schedules with associated resources were developed, with the results serving as the basis for all the EPU estimates. Mr. Moore presented the estimate to Bechtel customer senior management.

Project Planner, Midwest Generation Powertrain Environmental Program Project

2008–2009: Mr. Moore's responsibilities included scheduling lead for all aspects of schedule development including engineering, construction, procurement, startup, client, and OEM partner schedule integration on this project to install an air quality control system on a dual unit coal-fired power plant. He worked directly with project management, client management, and OEM management developing all levels of schedule (Level I, II, III, IV), implementing the use of Primavera 6.0 on the project.

Project Planner, Sammis Air Quality Control System Retrofit Project

2008: Mr. Moore provided direction and training to the onsite planning staff on this 2,200 MW coal plant, facilitating communication between the Bechtel and Client organizations through interactive white-boarding schedule development sessions. He led the planning effort of the main transformer installation and its related outage, discovering and fixing issues as they arose. He also developed a new tracking report to be used by Bechtel and Client management that tracked real-time data in association with bulk piping installation.

Project Planner, Sutherland Project

2007–2008: Mr. Moore supported the development of the initial estimate and schedule for this proposed power project, developing a level II schedule and supporting documentation to successfully convey project schedule viability, and presenting the overall plan to the project team and leading discussions on its future development including risks and challenges.

Engineering Planner/Lead Planner, Oak Creek Expansion (Elm Road) Project

2004–2007: As Lead Planner on Elm Road, a 1,300 MW two-unit ERC new build coal-fired power plant, Mr. Moore was responsible for coordinating and issuing the critical action items and chairing the CAI meeting. He provided technical direction to the lead engineering planner and supported field personnel. He also led a number of special studies and 'what if' analyses, as directed by the Project Director. He participated in the rebaselining of the construction schedule, developed multiple detailed schedule tracking tools to better define project goals, provided important analysis regarding the timing of cable deliveries to take advantage of the future reduction in the market price of copper, and developed the first startup level 3 detailed schedule.

As Engineering Planner, Mr. Moore was responsible for maintaining the Level I, Level II, and Level III schedules, creating and maintaining bulk commodity curves for Engineering releases and the project short-term work plan, analyzing entire schedule network to avoid potential issues with project deliveries, leading procurement activities to ensure timely delivery of materials by establishing delivery dates for material requisition, reviewing cost estimates and trends for schedule impacts, and developing and maintaining the Engineering Progress & Performance Report and the Engineering dashboard.

Engineering Planner, Mountain View Combined Cycle Gas Turbine Project

2003–2004: Mr. Moore's responsibilities included developing and maintaining the Level I, Level II, and Level III schedules, bulk commodity curves for engineering releases, and the project short-term work plan. He was also responsible for analyzing the entire schedule network to avoid potential issues with project deliveries, leading procurement activities to ensure timely delivery of materials by establishing delivery dates for material requisition, reviewing cost estimates and trends for schedule impacts, and communicating the overall project schedule to the project and client management.

Proposal Planner, Bechtel Power Project Controls Central Function

2000–2003: Mr. Moore worked with business development managers and construction managers to assist in development of strategic positions of new proposals. He was responsible for developing the milestone summary schedules for management reviews during the proposal phase, developing Level II project schedules, developing and maintaining Level III P3 schedules, developing bulk curves and manpower curves, producing development schedules for pre-NTP phase and proposal phase, and maintaining comparison data for new proposals. Proposals ranged in value from \$300 million to \$3 Billion.

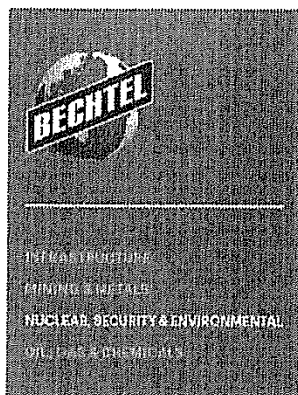
Indirect Estimator, Bechtel Power Estimating

1998–2000: Mr. Moore was responsible for developing craft wage rates, supporting the development of manual distributable costs, developing home office costs, tracking metrics for proposal costs and services estimates, gathering data for quantity and jobhour comparisons, supporting the preparation of proposal review packages, developing proposal cashflows and proposal profitability summaries, and preparing proposal pricing sheets.

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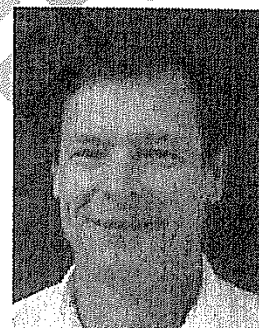
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Robert E. Pedigo

Project Startup Manager



Technical Qualifications

- Registered Professional Engineer, Pennsylvania (Electrical) and Illinois (inactive)
- Six Sigma Black Belt

Education

- B.S., Electrical Engineering, Pennsylvania State University

Bob Pedigo is a seasoned Startup Manager with 38 years of increasing responsibilities both on projects and in functional management. He is a Bechtel Startup Subject Matter Expert, and his expertise includes plant startup and startup planning of systems and facilities, plant maintenance and reliability (nuclear, petrochemical, and industrial), procedure development, and multi-discipline organization coordination. In addition, he is a Six Sigma Black Belt who has successfully developed and implemented several startup process improvements.

Deputy Manager of Startup, Bechtel Oil, Gas & Chemicals (OG&C)

2014–Present: Mr. Pedigo is responsible for startup functional oversight of the OG&C global business unit projects in development and execution around the world.

Chief Startup Engineer, Bechtel OG&C

2013–2014: Mr. Pedigo was responsible for overseeing startup at multiple Liquefied Natural Gas (LNG) projects from the Houston OG&C headquarters.

Chief Startup Engineer, Bechtel Corporation

2011–2013: Mr. Pedigo was responsible for the continued development and revision of Bechtel's corporate Startup Procedures (content and configuration management) and the management of the corporate Startup Engineer Certification program and oversight of corporate startup records and archives. In addition, he served as a Startup Subject Matter Experts for several nuclear power and LNG projects.

Project Startup Manager, mPower Small Modular Reactor (SMR) and Calvert Cliffs Unit 3

2008–2011: On the mPower SMR project, Mr. Pedigo oversaw design input, program development, and early project planning during the development of the SMR design and execution planning. On Calvert Cliffs 3, he performed design input, program development, and early project planning for the US-EPR nuclear power reactor design that was proposed for the Calvert Cliffs site.

Assistant Manager of Startup, Bechtel OG&C

2004–2008: Mr. Pedigo assisted in startup functional oversight of OG&C projects in development and execution

Six Sigma Black Belt, Bechtel Corporation

2003–2004: As one of the Six Sigma Black Belts, Mr. Pedigo successfully developed, completed, and implemented two Process Improvement Projects (PIPs), that improved Bechtel's process and procedures for Steam Line Cleaning and Chemical Cleaning. He also conducted Six Sigma awareness training and program audits throughout the company.

Project Support Supervisor, Bechtel Corporation

2000–2003: Mr. Pedigo's responsibilities included project development support (proposal estimating, schedule development, and execution philosophy input), project execution support, and startup execution philosophy research and development for projects mainly in the Power and Government Services sectors.

Lead Startup Engineer, River Protection Project

1999–2000: Mr. Pedigo's responsibilities included development of the startup portion of project estimate and schedule, development of commissioning strategy and startup program, development of test section of the

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Robert E. Pedigo

Preliminary Safety Analysis Report, and provision of input to design for startup, maintenance, and operations on this Department of Energy nuclear waste vitrification project in eastern Washington.

Site Manager, BP Amoco and Koch Refinery Projects

1997-1999: Mr. Pedigo had overall responsibilities for capital projects, maintenance support, and turnarounds at BP Amoco's Pasadena, TX plant. For the Koch Refinery, he had responsibility for 300 direct hire craft and 35 non-manual staff, with scopes of work including maintenance, turnarounds, and capital projects under \$10 million.

Project Startup Engineer, Koch Refinery and Hoechst Celanese Projects

1994-1997: Mr. Pedigo's responsibilities included Koch/Bechtel Alliance development, Koch Corporate maintenance program reengineering, KRC-CC maintenance program development (east and west plants), plant reliability program development, maintenance technology development, and maintenance resource redeployment. On the Hoechst project, his duties included client maintenance organization restructuring, plant reliability program improvement, process and equipment improvements, and plant preventive / predictive maintenance program development.

Project Engineer, Dresden and Quad Cities Nuclear Power Plant Maintenance & Modification

1991-1994: Mr. Pedigo's responsibilities included oversight of the resident engineering group, client interfaces, building a resident team, and facilitating execution of work, as well as project planning, maintenance group restructuring, and site procurement process evaluations.

Project Startup Engineer, Susquehanna Steam Electric Station

1987-1991: Mr. Pedigo served as site manager for all Bechtel activities at Susquehanna, including interfaces for operating plant services and coordinating support with multiple Bechtel offices. Additionally, he performed in a seconded role to PP&L as a mechanical maintenance planner. His responsibilities included generating work plans for work authorization documents using PP&L mainframe, knowledge of ASME Code (including NIS-2 forms, code repair forms and code retest and inspection requirements), familiarity with plant technical specifications, preparation of weld travelers, jobhour estimating, ALARA radiation blocking, personnel safety blocking, materials and parts, operating plant impacts, special tooling and techniques.

Senior Startup Engineer, Susquehanna Steam Electric Station

1982-1987: Mr. Pedigo was ACR/PGCC group supervisor, responsible for special projects, design change package implementation, Regulatory Guide 1.97 changes, and human factors engineering. Additionally, as supervisor of the procedure-writing group, he was responsible for technical specification compliance review documents and local panel alarm response procedures. Later on in the project, he was responsible for project coordination and startup of an additional standby emergency diesel generator, as well as schedule development, project scoping, design compliance, and operability review.

Startup Engineer, Susquehanna Steam Electric Station

1980-1982: Mr. Pedigo was responsible for the startup worklist (open items tracking), as well as the startup of the standby diesel generator and 24 and 125 V DC systems. He assisted in the Unit 1 integrated leakage rate test and preliminary work for vessel nuclear instrumentation.

Field Engineer, Comanche Peak Nuclear Generating Station

1979-1980: Mr. Pedigo was responsible for generating turnover packages, system scoping, and system walkdowns; generating and verifying construction punchlist completion; conducting weekly construction turnover progress meetings; and presenting system turnover to client.

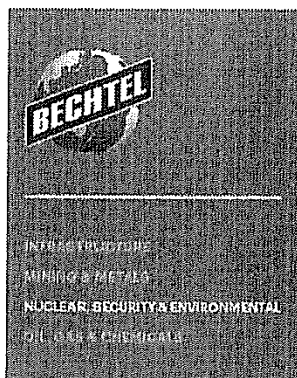
Field Engineer, Susquehanna Steam Electric Station

1976-1978: Mr. Pedigo was responsible for the electrical and instrumentation portion of the primary containment structural integrity test, civil support in the reactor building and control structure, and raceway and equipment installation for the control structure, containment, and reactor buildings, including the advanced control room/power generation control complex (ACR/PGCC).

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Jerry B. Pettis

Project Administrator

Education

- B.S., Business Administration, Lander University

Military Service

- U.S. Army, 1968-1971
- South Carolina Army National Guard, 1972-1979

Jerry Pettis is a seasoned, results-oriented professional with 26 years of experience within contractor organizations supporting Department of Energy nuclear facilities and the National Nuclear Security Administration. He has proven leadership capabilities in interpreting and executing requirements, reducing costs, maximizing team productivity, and developing innovative tools. He has successfully managed teams responsible for a variety of administrative functions to include prime contract requirements, records administration, document control, publications, training, and related budgetary processes. He has returned to Bechtel employ after several years of retirement.



Document Services Manager, Depleted Uranium Hexafluoride (DUF6) Project, B&W Conversion Services

2011-2013: Mr. Pettis managed the document and records functions for the DUF6 conversion plants in Paducah, Kentucky and Piketon, Ohio, as well as the executive office functions located in Lexington, Kentucky. His responsibilities included managing all project records, document control, and procedures functions. He ensured that Department of Energy (DOE) documents and records were created, maintained, captured, and protected per published requirements.

Manager, TA-21 Project Services and Infrastructure, Los Alamos National Laboratory, Bechtel National

2009-2011: Mr. Pettis managed administrative and facility services for a \$212 million American Recovery and Reinvestment Act of 2009 (ARRA) environmental restoration and decontamination and decommissioning project. His responsibilities included ensuring that the stringent reporting requirements required by ARRA were met; managing all project records, document control, and procedures functions; project training development; implementation and tracking; development and implementation of a robust internal and external communications and outreach program; facility utilization and staff assignment activities; project issues tracking and resolution, and project security.

Requirements Manager, Prime Contract Management Office, Lawrence Livermore National Laboratory, Bechtel National

2007-2009: Mr. Pettis managed complex activities for the laboratory's prime contract, which include ensuring that organizational objectives involving the performance evaluation process, program direction, cost allowability, and other aspects of prime contract management are met. He also was the institutional interface between the company and external agencies for the evaluation and interpretation of regulations and directives for applicability to the prime contract, coordinating with National Nuclear Security Agency's Livermore Site Office in making changes to the list of DOE orders, policies, notices, and standards included in Appendix G of the prime contract. Additionally, he ensured that responsible managers assess the cost and schedule impacts of any proposed addition of requirements to the contract and coordinating assessment outcomes with the Livermore Site Office.

Document Control Group Leader, Information Resources Management Division, Los Alamos National Laboratory, Bechtel National

2006-2007: Mr. Pettis managed complex activities for institutional level document control activities by establishing an institutional, customer focused, centralized document control program for the laboratory; integrating numerous disparate document control processes and systems into an integrated program. He established minimum training and performance expectations for laboratory document control staff to ensure consistent document control capability and that the appropriate laboratory documents were retained and up-to-date versions were available to all users in a timely fashion. He also supported the Information Resources Management Division Leader in developing and monitoring the division budget.

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Jerry B. Pettis

Manager, Information Resources Department, Nevada Test Site, Bechtel National

2004-2006: Mr. Pettis managed complex institutional level activities for a variety of administrative and technical support services for Bechtel's work on the Nevada Test Site. His responsibilities included functional management of all Bechtel administrative employees and technical writers; operation of the Nuclear Testing Archive; program management for all institutional records and document control; institutional scientific and technical information programs; office services functions such as printing and reproduction services, mail services, printing services through the Government Printing Office (GPO), and convenience copier program management.

Manager, Program Administration and Support Department, Soil & Groundwater Closure Projects, Savannah River Site, Bechtel National

2002-2004: Mr. Pettis managed extensive department level activities in support of environmental restoration activities at the 310 square mile Savannah River Site. His responsibilities included development and implementation operations and regulatory training for environmental restoration employees; development, revision, publication and maintenance of procedures; production of a large number of regulatory documents; development of graphics and presentations to support internal and external communication of the environmental restoration mission, challenges, and successes; document control and records management to include management of the sites Administrative Record and public reading room materials, maintenance of the reproduction center and capability; coordination and management of division clerical and secretarial support personnel; and accountability and inventory of all division property and facilities.

Division Training, Procedures, and Reporting Manager, Soil & Groundwater Closure Projects, Savannah River Site, Bechtel National

1995-2002: Mr. Pettis managed division level activities that included the analysis, design, implementation, evaluation, and maintenance of initial and continuing training for job-specific operator, staff, supervisor and manager training programs. These programs included general, task specific, and regulatory training for 400+ employees and subcontractors; the development, scheduling, publication, and technical support for presentations and reporting to audiences including Department of Energy, Environmental Protection Agency, South Carolina Department of Health & Environmental Control, and the site's Citizen's Advisory Board. He also oversaw the management and maintenance of the division's emergency action and emergency response programs.

Administrative Manager, 400-D Power House, Savannah River Site

1993-1995: Mr. Pettis managed all phases of administrative support for the site's 70 MW coal fired power and steam plant, including the interpretation and administration of Power Operations Department plans and policies; document control and records management; procedures development, and publication and maintenance. He was also responsible for the analysis, design, implementation, evaluation, and maintenance of initial and continuing training for job-specific operator, staff, supervisor and manager training programs for 300+ employees, as well as facility issues investigation as Critique Director. He also functioned as interface with the DOE facility representative for resolving identified facility and programmatic issues and served as area emergency coordinator.

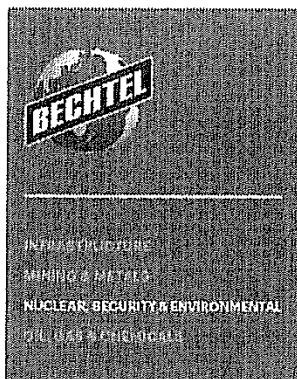
1987-1993: Prior to his position as Administrative Manager, Mr. Pettis held several positions of increasing complexity and responsibility at Savannah River, including the development of a cross functional team to identify, categorize, inspect and maintain the site's earthen dams. He was awarded the prestigious George Westinghouse Signature Award of Excellence for successfully supervising the \$10 million, 18 month, PAR Pond earthen dam emergency stabilization project.

Various positions in manufacturing, civil service, finance, management consulting, and banking
1967-1987

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Michael K. Robinson

Construction Manager



Technical Qualifications

- Registered Professional Engineer in Pennsylvania

Education

- B.S., Civil Engineering, University of California
- Certificate, Bechtel Executive Plan XVIII

Mike Robinson has more than 44 years of project and corporate management, construction, and engineering experience on various fossil and nuclear power generation projects worldwide, as well as U.S. Government environmental remediation and infrastructure rebuilding efforts. He has provided leadership on some of the largest mega-projects in the power and government sectors. His career has spanned all aspects of project and construction management of solid fuel, natural gas, and nuclear facilities, as well as commercial and engineering roles of increasing responsibility. He is a proven and highly respected leader who is equally adept in managerial, technical, and commercial roles. He has recently returned to Bechtel after several years in retirement.

Project Manager/Site Manager, Crystal River Unit 3 Containment Repair Project

2012-2013: Mr. Robinson led the multi-disciplinary team to develop engineering/construction solutions and cost and schedule estimates for the Crystal River 3 containment delamination repairs, one of the most technically daunting efforts in the industry, from its initial development through the phase I engineering effort until the project was cancelled by the customer and the plant permanently shut.

Project Manager, M-3 Mixing Project

2010-2011: Mr. Robinson was responsible for managing the closure of the mixing issues for the waste receiving, transfer, and mixing tanks and issues associated with them for this Department of Energy (DOE) site. Project requirements were to design the systems and provide testing that demonstrates the design works. DOE HQ and local office personnel required that any issues surrounding the Mixing Project were identified to ensure that the plant will operate for its 40-year life.

Area Project Manager/Project Operations Manager, Waste Treatment Plant (WTP)

2007-2010: Mr. Robinson was the Area Project Manager for the Plant-wide account that includes Engineering, Construction, Acquisition Services, Materials Management, and Startup for this \$15B+ project. He had the responsibility to ensure that each department is meeting their budgets and schedules, have proper staff to meet the project needs, and have proper plans to go forward. Each department had to identify any cost or schedule changes and have adequate documentation and justification for those changes. Mr. Robinson interfaced daily with his client counterpart to ensure they were aware of current issues and events. In addition, he was the Project Operations Manager, and these additional responsibilities included safeguards and security, risk management, project support, and special project management projects. Mike was also the Six Sigma deployment manager.

Site Manager, Oak Creek Expansion Project (Elm Road)

2004-2007: In this capacity, Mr. Robinson was involved in developing the construction philosophy for this 1,300 MW two-unit EPC new build coal-fired power plant, including detailed up-front planning for execution of the project, staffing, schedule, erection scheme, and interface with engineering, vendors, subcontractors, and unions. The execution of the work included day-to-day direction of all construction personnel, interface with the owner and other agencies to resolve open issues, answer questions, and coordinate plans because of the existing power plant on the same site.

Operations Manager, Iraq Project

2003-2004: Mr. Robinson was responsible for all work in the northern two thirds of Iraq, which included included power projects, water and waste projects, bridge repair, telephone infrastructure repair, and school and hospital repair. Daily interface with both USAID and the U.S. military as required to coordinate work and ensure the most pressing projects were worked and funds were available. Additional coordination with the

Roston, Virginia

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Michael K. Robinson

Imqi Ministry personnel was also required to ensure they were kept informed about the status of projects, and they agreed with the proposed projects being planned.

Fossil Operations Manager-North America, Bechtel Power

2000-2003: Mr. Robinson was responsible for project execution of over half of the on-going North American power projects, including establishing the project management philosophy and procedures, continuously monitoring the project status including cost, schedule, safety, staffing, trends, change orders, and client relations. He provided real time feedback and guidance to the project managers about their performance, in addition to providing training and personal development. Mike assisted Business Development with project development and reviewed the commercial issues to ensure that they met business requirements.

Fossil Operations Manager-Europe, Africa, Middle East, Bechtel Power

1999-2000: In this capacity, Mr. Robinson was responsible for project execution of all power projects in the EAM region, including establishing project management philosophy and procedures. He continuously monitored project progress including cost, schedule, safety, client relations, staffing, and trends. Mike assisted with Business Development efforts and concurred with final estimates. He interfaced with other Regional Ops Managers to optimize resource usage and project execution.

Project Director, Dabhol Power Station Project

1994-1999: Bechtel and General Electric (GE) formed a consortium to perform the engineering, procurement, construction, and startup of this 2,240 MW combined cycle power project in India (at the time the largest foreign investment in India), with GE providing the major equipment and Bechtel providing the balance of the work. Mike had overall responsibility for the consortium, as well as being the public interface with the Owners' Project Director. Primary activities included developing project execution philosophy, Bechtel/GE interface, and day-to-day direction to the project managers and site manager.

Manager of Projects, Fossil, Bechtel Power

1992-1994: Mr. Robinson was responsible for the overall management of numerous fossil projects in various stages of development and execution. He supervised project managers and assisted them in setting goals and establishing philosophy of approach to individual projects. Mike provided guidance to project managers in their day-to-day activities, including client relationship and providing formal and informal training and development of the project managers. He also coordinated interaction between projects in areas of business line goals, company direction, relevant project experience, resource sharing and allocation, and other pertinent information.

Project Manager, Coryton Cogeneration Power Project

1991-1992: Mr. Robinson was responsible for developing a lump sum package for the engineering, procurement, construction, and startup of a 500 MW combined cycle cogeneration plant for the Mobil Refinery in Coryton, England. Work included preliminary engineering to identify the technical scope of the project, selection and negotiation for lump sum contracts for the gas turbines, steam turbine, HRSG, and air-cooled condenser. Also included were development of a construction and labor relations' plan, project schedule, startup program, and full lump sum estimate. Assistance was provided to the client for permitting and non-recourse financing. Contractual negotiations for all terms and conditions were also included.

Project Manager, Panther Creek Project

1989-1991: Mr. Robinson assisted in project development including contract negotiations, cost, schedule, and testing requirements. He was responsible for project execution and management of engineering, construction, startup, procurement, and project controls. Mike coordinated and communicated with client/owner including change order negotiation and approval. He established terms and philosophy of job execution and kept appropriate management updated on project status. Mike also tracked job to final and successful completion.

Project Manager, Scrubgrass Project

1989-1989: Mr. Robinson assisted in project development including contract negotiations, cost, schedule, and testing requirements. He was responsible for project execution and management of engineering, construction, startup, procurement, and project controls. Mike coordinated and communicated with client/owner including change order negotiation and approval. He established terms and philosophy of job execution and kept appropriate management updated on project status.

Project Superintendent, Giltberton Cogeneration Project

1986-1989: Mr. Robinson was the Project Superintendent for the construction of a \$100 million cogeneration facility. Contract included power plant and coal handling facility — 40 percent was subcontracted. Mike supervised 30 nonmanual and 200 craftsmen.

Lead Contracts Coordinator, Scott Paper Cogeneration Project

1984-1986: Mr. Robinson's duties included front end planning and contract package scoping. He also supervised the contract coordination on a fluidized bed boiler.

Civil, Mechanical, and Electrical Craft Superintendent, Grand Gulf Nuclear Power Plant

1983-1984: Mr. Robinson's duties included front end planning and contract package scoping. He also supervised the contract coordination on a fluidized bed boiler.

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Michael K. Robinson

Lead Civil Contracts Coordinator, Martin Marietta Coal Conversion

1981-1983: Mr. Robinson coordinated civil contracts, including contracts and specification interpretation, inspected and accepted the work, and negotiated extras and claims.

Various Civil Engineering and Quality Positions, Grand Gulf Nuclear Power Plant

1975-1981: Assignments at Grand Gulf included Assistant Lead Civil Engineer, Lead Area Engineer for the yard and control building, and Resident Civil Engineer. Mike acted on behalf of the Project Engineer at the jobsite. Duties as Lead Civil Quality Control Engineer and Assistant Project Field Quality Control Engineer included assisting in implementation of the project quality control policy and coordinating the work of all QC disciplines. Later assignments included responsibility for senior contractors' changes, invoice approval, and monthly progress meetings. As HVAC Coordinator, Mike coordinated the completion of all heating and ventilating systems with the contractor and Bechtel. He supervised up to 100 people.

Construction Coordinator, SNUPPS

1972-1976: Mike reviewed drawings, specifications, project schedules, and procurement packages for final design phase and construction for the SNUPPS nuclear plant.

Civil Design Engineer, FFTF

1971-1972: Mike performed structural design and analysis for structural steel and concrete structures.

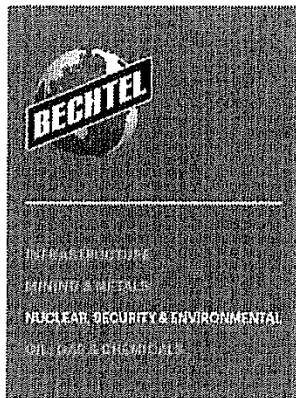
Civil Field Engineer, Calvert Cliffs Nuclear Power Plant

1969-1971: Mike was responsible for planning and scheduling, inspecting field placement, review drawings, quantity accounting, and scheduling civil activities.

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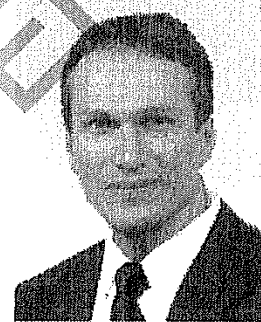
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Stephen D. Routh

**Project Manager
(Engineering and Licensing)**



Technical Qualifications

- Registered Professional Engineer, Virginia
- Six Sigma Champion

Education

- M.B.A., Finance, Mount St. Mary's College
- MEng., Nuclear Engineering, Pennsylvania State University
- B.S., Nuclear Engineering, Pennsylvania State University

Memberships

- Member, American Nuclear Society
- Member, ANS Large Light Water Reactor Consensus Committee
- Member, EPRI Advanced Nuclear Technology Group
- Member, NEI COL Task Force
- Member, NEI Seismic Issues Task Force

Steve Routh is a Senior Project Manager with over 35 years of nuclear experience and is currently the manager of Bechtel's Nuclear Engineering Services group. He has supported new nuclear generation efforts at various sites since 2001 and is recognized as an industry expert in nuclear engineering, safety, and licensing. Additionally, Steve is an active member of NEI and EPRI new generation task forces and working groups.

Manager, Nuclear Engineering Services

2009–Present: Mr. Routh is responsible for Bechtel's engineering and licensing services projects including support of operating plants, new nuclear generation, Fukushima response projects, and proposal preparation. He was previously the Project Manager for New Nuclear Generation Projects. Projects supported during this period include:

- North Anna Unit 3 Owner's Engineer and COL (APWR/ESBWR)
- Turkey Point COL (AP1000)
- Calvert Cliffs COL (U.S. EPR)
- South Texas COL (ABWR)
- V.C. Summer Units 2 & 3 Engineering and Licensing Support (AP1000)
- FENOC New Nuclear Site Selection Study (mPower)
- AREVA DCD (U.S. EPR)
- Clinch River Construction Permit Application (mPower)
- Dominion, South Texas, Watts Bar, and Constellation Fukushima response projects
- SONGS Spent Fuel Pool Island Cooling
- Vermont Yankee Decommissioning Cost Estimate
- Monticello and Prairie Island design modifications
- Fennovoima (Finland) New Plant Constructability and Schedule Assessment (EPR and ABWR)
- Wylfa Newydd (UK) New Plant Schedule and Cost Study (ABWR)

Additionally, Mr. Routh managed Bechtel's overall Fukushima response efforts including industry representation and development of approaches and capabilities, as well as responsibility for nuclear power proposal preparation.

Project Manager, Early Site Permit/Combined Operating License Technology Group

2001–2008: As Manager of the ESP/COL Technology Group, Mr. Routh provided engineering and licensing oversight of Bechtel's new generation projects (Calvert Cliffs, North Anna, South Texas, Vogtle, V.C. Summer, Turkey Point, and Victoria County). He was also the project manager for the North Anna ESP project, North Anna COL and Site Engineering project, and the Turkey Point COL project.

Manager of Regulatory Affairs, Nuclear Power

1999–2001: Mr. Routh was responsible for the licensing and regulatory oversight of the Bechtel nuclear power projects (new nuclear generation, steam generator replacements [SGRs], operating plant services) and SERCH, Bechtel's generic licensing service.

Reston, Virginia

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701316-09/15-1

Stephen D. Routh

Licensing and Safety Analysis Supervisor, U. S. Enrichment Corporation

1995-1999: Mr. Routh managed the preparation of the upgraded Safety Analysis Reports for the Paducah and Portsmouth gaseous diffusion plants and managed activities for the project team including subcontractor support. He also provided detailed cost and schedule control, technical review of revised analyses; responded to NRC questions, and interfaced with NRC and DOE personnel. Mr. Routh also established regulatory processes for NRC oversight.

Project Engineer for the North Anna 1, North Anna 2, and Ginna Steam Generator Replacement Projects

1991-1995: Mr. Routh's duties included managing mechanical, materials, civil, nuclear, and licensing engineering activities in support of the projects including evaluation of alternative approaches, conceptual and detailed engineering, constructability reviews, subcontractor control, and client interface.

Assistant Chief Nuclear Engineer

1987-1991: Mr. Routh provided nuclear licensing support to operating plant services projects in the areas of design change packages operability and safety evaluations, justified continued operations, Part 21s, and NRC interaction, and assisted in the administration of the nuclear department and salary planning.

Nuclear/Licensing Supervisor

1983-1987: Mr. Routh prepared the safety analysis report, environmental report, and license documents for the Surry plant dry cask independent spent fuel storage installation (the first licensed in the United States), and supported several other operating plant services and SGR projects.

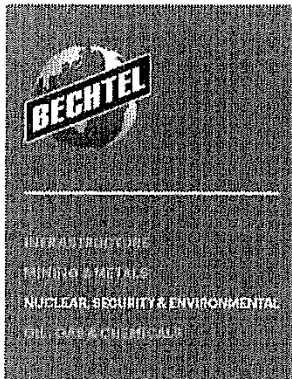
Licensing Engineer/Deputy Supervisor, Grand Gulf Project

1980-1982: Mr. Routh supported the licensing effort for the operating license, preparation of the FSAR, environmental report, and the technical specifications. He supported NRC question responses, public hearings, as well as NRC safety evaluation report review and SER open item responses.

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701316-09/15-2



Edward (Ed) A. Sherow

Engineering Manager



Technical Qualifications

- Six Sigma Champion

Education

- B.S., Electrical Engineering, Rensselaer Polytechnic Institute

Ed Sherow has over 43 years of engineering experience in the nuclear and fossil power industry, focusing on all phases of power plant activities, with specific background in electrical. He has worked on numerous projects throughout his career including Calvert Cliffs, Grand Gulf, Turkey Point, and Brown's Ferry Units 1 and 3 nuclear plants, as well as the design development of the U.S. EPR and the associated submittal of a COL for Calvert Cliffs Unit 3.

Engineering Manager, Nuclear Projects

2012–Present: Mr. Sherow is currently responsible for functional engineering management oversight, development, and execution of multiple nuclear projects. Work involves assistance and review of project estimates/schedules, project setup and staffing review, quality, schedule, and budget performance monitoring, project-specific process and procedural approvals, and coordination of lessons learned/experiences between multiple nuclear projects.

Nuclear Project Engineering Manager/Project Engineer, U.S. EPR Design Development & Certification and Calvert Cliffs Unit 3 COLA

2005–2011: Mr. Sherow managed the detailed design for the U.S. EPR, a 1,600 MW Generation III+ nuclear plant, with the first plant in the U.S. targeted for Calvert Cliffs. He also managed the work associated with supporting AREVA in achieving design certification. He also managed the development and support to UniStar (JV of EdF and Constellation) for submittal of the Combined Operating License Application for Calvert Cliffs Unit 3 based upon the EPR technology.

Fossil Project Engineer, Fossil Technology Group

2005–2005: Mr. Sherow managed the development and design of fossil generation plants. Work involved supervision or coordination of multidisciplinary engineers, technical specialists, estimators, and Business Development to provide proposals and the development aspects of fossil power projects. Close client coordination was required.

Task Integration Manager/Metrics Manager, Browns Ferry Unit 1 Restart Project

2003–2005: Mr. Sherow was responsible for the overall execution and quality of work relating to metrics reporting, integrated task equipment list programming/data integrity, and overall training program.

Assistant Project Manager/Project Engineer, Mountainview CCGT Project

2001–2003: As assistant project manager on this combined cycle gas project, Mr. Sherow's responsibilities included supervising execution planning, contract administration of the EPC Agreement, contract administration of major equipment (including the GE Power Island subcontract), contract compliance as well as the championing of other specific areas of critical concern to the success of the project. He was also responsible for interface with the Owner's project manager and for monitoring cost and schedule progress. As project engineer, he was also responsible for the overall engineering of the project, including technical correctness, compliance with codes, optimizing design/installation costs, and interface with suppliers and owner.

Fossil Project Engineer, Fossil Technology Group

1999–2001: Mr. Sherow managed the development and design of fossil generation plants. Work involved supervision or coordination of multidisciplinary engineers, technical specialists, estimators, and Business Development to provide proposals and the development aspects of fossil power projects. Close client coordination was required. During this period, Mr. Sherow also completed a 7-month assignment in 2000 at the Red Hills Generation Facility jobsite, a 440 MW CFB in Mississippi, as the Project Field Engineer responsible for all Field Engineering activities at the site.

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572063-09/15-1

Edward A. Sherow

Multi Project Acquisition Group (MPAG) Manager, MPAG

1996-1999: Mr. Sherow managed the electrical MPAG. The group is an integrated cross-functional team of engineering and procurement personnel implementing the Bechtel supply chain strategy. Efforts focused on optimizing and managing cost and schedule in the delivery of equipment. Key items included interfacing power projects and suppliers, implementing standard products, making process improvements and negotiating supplier agreements. During this period, he managed the combined Electrical/Control Systems MPAG until it was separated into two groups.

Project Manager, Substation/Transmission Engineering

1993-1996: In this assignment, Mr. Sherow was responsible for commercial and technical operations of the Gailthersburg Substation/Transmission Engineering (STE) Group. The STE Group varied in size from 20 to 30 multidiscipline engineers doing switchyard and transmission line work directly for utilities while also supporting Bechtel New Generation projects.

Project Engineer, Browns Ferry Nuclear Unit 3

1991-1993: Mr. Sherow's responsibilities included overseeing the electrical discipline consisting of 135 to 200 engineers preparing design modifications for upgrading Unit 3 to allow restart. Effort included monitoring schedules for all activities, monitoring costs, interfacing with client, supervising personnel, and preparing, evaluating, and approving proposals. He was also responsible for special projects and later the DCN Production Group. Special projects duties included overall responsibility for Procurement Engineering Group and engineering scheduling for restart of Browns Ferry Unit 3. For the DCN Production Group, he was responsible for multidiscipline group of 250 engineers preparing design modifications for upgrade of Unit 3 to allow restart. Effort included monitoring schedules for all activities, monitoring costs, interfacing with the client, and preparing, evaluating, and approving DCN modification packages.

Project Engineer/Group Supervisor, FPL Projects

1986-1991: Mr. Sherow was responsible for managing FPL's drawing update efforts for Turkey Point Units 3 and 4. Work included approving drawings as client representative, monitoring and controlling work output, reviewing indicators, assigning work priorities for up to 60 people, and maintaining budgets/schedules. He was also responsible for managing the design fossil operating plant services and the electrical and I&C work.

Group Supervisor, Electrical/Control Systems Group, Operating Services

1984-1986: Mr. Sherow's tasks included supervising electrical and instrumentation and controls (I&C) work at various operating plants. He approved drawings, calculations and installation packages, preparing/evaluating proposals, coordinating with vendors/client, monitoring schedules/budgets, and electrical/control systems work of up to 20 engineers. Typical projects included addition of a precipitator for BG&E H.A. Wagner Unit 3, addition of dry cask spent fuel storage, radiation monitoring upgrade, and a facilities renovation for Virginia Power's North Anna and Surry Nuclear Stations, addition of natural gas warm-up for BG&E H.A. Wagner Unit 2, upgrading coal handling and sampling for Virginia Power's Mt. Storm Plant, a conversion to natural gas for FPL's Martin plants, and using coal water slurry as an alternate fuel for the Pfizer plant at Groton.

Group Supervisor, Electrical/Control Systems Group, Grand Gulf Units 1 and 2

1976-1984: In this assignment, Mr. Sherow's responsibilities included approving drawings, calculations, and installation packages, preparing/evaluating proposals, coordinating with vendors/client, monitoring schedules/budgets, and supervising electrical and I&C work.

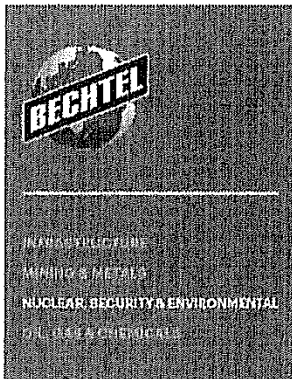
Electrical Field Engineer, Calvert Cliffs Units 1 & 2 and Grand Gulf Unit 1

1972-1980: Mr. Sherow was responsible for overall installation and turnover to Startup of various plant systems. Duties included verifying system scope, walking down the system to ensure construction-reflected design, interfacing with Design Engineering, preparing punch lists for outstanding items, and releasing systems to Startup. He was also responsible for cable installation. Duties included verifying routing (both by drawing review and walkdowns), correcting routings, cable inspections, initiating termination installation, cable termination inspection, documentation reviews, and resolving problems.

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572063-09/15-2



George D. Spindle

Construction Manager

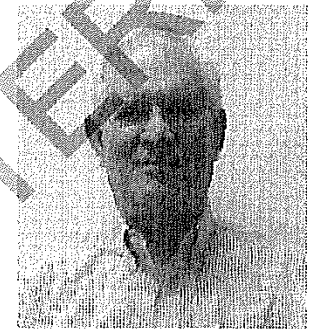
Technical Qualifications

- Registered Civil Engineer, California and Pennsylvania (Retired)
- Member, National Society of Professional Engineers
- Member, California Society of Professional Engineers

Education

- B.S., Civil Engineering & Mathematics, University of Arizona
- Construction Executive Program, Texas A&M University

Over his 47 year Bechtel career, Mr. Spindle has served in a variety of construction management and leadership roles, both domestically and around the world. He offers broad and deep construction and managerial experience from nuclear and fossil power plants to oil and gas facilities with a variety of execution and contractual models. He has a proven ability to both manage and lead others in order to successfully execute projects on time and budget. Currently, Bechtel is privileged to have Mr. Spindle as a consultant resource, and he serves as a construction subject matter expert on a variety of Bechtel projects world-wide.



Consultant, Bechtel Group

2009–current: Since his retirement from Bechtel, Mr. Spindle has consulted on various Bechtel projects, providing insight on nuclear and fossil power, mining and metals, infrastructure, and oil and gas projects. His input has included analysis of execution strategies, risks, and implementation of lessons learned, as well as commercial and technical aspects of projects. He has also led two assessments of the status, challenges, and opportunities on the Watts Bar Unit 2 Completion Project.

Site Manager, Olympic Dam Project

2009: Mr. Spindle was the Site Manager of the Olympic Dam Project in Australia, a \$12B uranium mine for BHP-Billiton awarded to Bechtel on an EPC basis. He led the development and execution planning for the project until it was cancelled due to the economic downturn.

Manager of Construction, Bechtel Oil, Gas & Chemicals (OG&C)

2005–2008: Mr. Spindle oversaw the construction execution and personnel deployment for all OG&C projects world-wide.

Manager of Construction, Bechtel Construction Operations Incorporated (BCOI)

2000–2005: Mr. Spindle was responsible for the world-wide execution of construction projects, deployment of construction personnel, and the effective implementation of processes and procedures.

Manager of Construction, Bechtel Construction Co. / Bechtel Builders Inc.

1994–2000: Mr. Spindle was responsible for the execution of all construction projects in the Asia Pacific region, deployment of construction personnel, and the effective implementation of processes and procedures.

Manager of Construction, Bechtel Construction Co.

1992–1993: Mr. Spindle was responsible for the execution of all construction projects in Western North America and the Asia Pacific region, deployment of construction personnel, and the effective implementation of processes and procedures.

Manager of Construction, San Francisco Regional Office

1990–1992: Mr. Spindle was responsible for the execution of all construction projects sponsored by the SF office, deployment of construction personnel, and the effective implementation of processes and procedures.

Construction Manager, Bechtel Construction, Inc.

1989–1990: Mr. Spindle was responsible for the construction execution of all direct hire power and petroleum projects.

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S63955-09/15-1

George D. Spindle

Field Construction Manager, Basic American Foods American I Cogeneration Project

1988-1989: Mr. Spindle was responsible for the construction execution of this 120 MW California cogen project, which primarily uses natural gas to provide supply steam for vegetable drying and power to the electric grid.

Field Construction Manager, Gilroy Food Cogeneration Project

1986-1987: Mr. Spindle was responsible for the construction execution of this 115 MW California cogen project, which primarily uses natural gas to provide supply steam for food processing and power to the electric grid.

Field Construction Manager / Project Superintendent, Colstrip Units 3 & 4 Power Project

1979-1986: Mr. Spindle was responsible for the construction execution of two coal-fired units in Montana, producing 740 MW each. He began the project as Superintendent and in 1984 became the Field Construction Manager.

Lead Civil Superintendent, Limerick Nuclear Generating Station

1974-1979: Mr. Spindle was responsible for all civil work in the reactor buildings

Assistant Superintendent, Jim Bridger Generating Station

1973-1974: Mr. Spindle was responsible for supervising all craft personnel involved in civil earthworks on these four coal-fired units in Wyoming, producing a total of 2,110 MW.

Senior Field Engineer/Construction Coordinator, Limerick Nuclear Generating Station

1971-1973: As Senior FE, Mr. Spindle was responsible for construction planning and scheduling, and as CC he was the construction liaison between the field work and engineering.

Field Engineer, Monticello Nuclear Power Plant

1968-1970: Mr. Spindle was responsible for the construction planning and scheduling.

Various Construction Roles

1961-1968: Mr. Spindle held various construction labor and planning/scheduling positions.

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S63955-09/15-2

Appendix C

Bechtel Weekly Reports

PRIVILEGED MATERIAL

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**Bechtel Weekly Report
V.C. Summer Units 2 & 3 Completion Assessment
Week Ending August 28, 2015**

- Members of the Bechtel team are scheduled to arrive onsite on Tuesday afternoon, September 8.
- On August 19, Bechtel provided a suggested agenda for the Wednesday, September 9, Consortium presentation at the site. A revised version of the agenda was received from WEC on August 25. Some additional suggested changes were provided by Bechtel on August 26.
- On August 24, a conference call was held with WEC to discuss Bechtel's document request list:
 - WEC described the status of identifying and obtaining approval to release copies of documents to Bechtel.
 - WEC described that a document room would be setup in the NOB where hard copies of certain documents would be placed.
 - Bechtel provided clarifications of several documents requested to WEC on August 26.
 - No new documents were received from SCANA or the Consortium during the week. The last documents received were posted in SCANA's electronic reading room on August 14.
- A CD of the Owner's P6 Integrated Project Schedule (IPS) was received on August 19. Since then, Bechtel has down loaded the schedule, identified the subprojects, and has begun manipulations of the schedule data. Based on initial reviews:
 - The IPS CD does not include all of the P6 schedule files (e.g., the WEC Engineering files are missing and the Milestones integration file was not provided). Without the Milestones file, schedule calculations cannot be performed.
 - It appears that there are as many as 60 mandatory constraints in the schedule data base that are precluding a true calculation of critical path negative float. The path that will have the largest impact appears to be through the shield building.
 - There appear to be minimal quantities loaded in the schedule. Quantities for the next 3 months are included, but it is not clear if they are complete. Quantities loaded in the schedule are needed to understand the impacts on installation sustained unit rates.
 - A preliminary manpower curve extracted from the schedule shows a peak of around 450,000 hours (2,200 craft) for a single month. This appears significantly low for a two unit construction effort.

An initial discussion of the above schedule items was conducted with CB&I Project Controls personnel on August 26.

- Members of Bechtel's team continued their review of documents provided by SCANA and the Consortium.
- Began review of subproject schedules related to Construction. Also began review of subproject schedules containing Engineering, Licensing, Procurement/Subcontracts, and Quality Assurance activities.
- Prepared preliminary list of Construction discussion topics and questions in preparation for site mobilization and initial interviews.

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**Bechtel Weekly Report
V.C. Summer Units 2 & 3 Completion Assessment
Week Ending August 28, 2015**

- For Construction, Bechtel is interested in more information about the shield building. Bechtel's assessment will focus on panel fabrication, engineering tolerances, engineering changes, and installation sequencing. Installation of bulks is likely a near second critical path and will also be a focus area for the assessment.
- Information still needed from the Consortium for the Construction assessment includes:
 - Quantity curves
 - Unit rates
 - Manpower curves: non-manual and craft
 - Percent complete curves and method of calculation
 - Manpower loaded schedule
 - Equipment release dates
 - Module details, delivery schedules, and summary of all
 - Shield wall details and delivery and installation schedule

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**Bechtel Weekly Report
V.C. Summer Units 2 & 3 Completion Assessment
Week Ending September 4, 2015**

- Members of the Bechtel team are scheduled to arrive onsite on Tuesday afternoon, September 8.
- The Consortium presentation to the Bechtel team is scheduled for Wednesday, September 9. A final agenda was issued by WEC on September 7.
- Status of Bechtel's document request:
 - No new documents were received from the Consortium, SCANA, or Santee Cooper during the week. The last documents received were posted in SCANA's electronic reading room on August 14.
 - Members of Bechtel's team continued their review of documents that have been received to date.
 - In September 4 and 7 emails, WEC provided the following status of documents:

219 Total Items Requested

 - 138 items previously issued electronically or via IPS disc.
 - 20 items have been marked as duplicates to other items on the list.
 - 3 items have been approved as software access – no documentation required.
 - 1 item needs clarification from Bechtel regarding Bingo sheets (10.19).
 - 57 remaining items required approval to release.

Remaining 57 Items

 - 45 items have been approved and printed or made available for review. The reading room should be set up on Tuesday, September 8, for access by the Bechtel team.
 - 10 items have been approved and are part of the September 9 presentation and/or will be made available during follow-up deep dive sessions (difficult to produce copies of the information).
 - 1 item is approved but information is still being gathered regarding Construction Equipment plan (4.5).
 - 1 item will be discussed on September 9 - Engineering Manpower curves (10.13).
- A CD of the Owner's P6 Integrated Project Schedule (IPS) was received on August 19. Bechtel has down loaded the schedule, identified the subprojects, and is continuing to manipulate the schedule data. Bechtel's Project Controls, Construction, Engineering, Procurement, and Licensing personnel continued our review of the IPS information.

Bechtel Weekly Report
V.C. Summer Units 2 & 3 Completion Assessment
Week Ending September 11, 2015

1.	Work Activities Performed Last Week (September 8-11)
1.1	<p>General</p> <ul style="list-style-type: none"> The Bechtel Assessment team arrived on Tuesday, September 8, 2015 to begin the six-week, onsite assessment effort. WEC and CB&I Consortium members gave a full-day presentation to the Bechtel Assessment team on Wednesday, September 9, 2015. Copies of the presentation were placed in the Assessment Reading Room. The Bechtel Assessment team spent most of Thursday, September 10, and a large part of Friday, September 11, in training in order for the Bechtel team members to be granted a badge that will allow the Bechtel personnel unescorted access to the site. It is expected that the badges for unescorted access will be issued sometime during the week of September 14. On Friday morning, September 11, SCE&G provided a site tour of Units 2 & 3 and a majority of the lay down areas. All of the Bechtel team members on site took this tour. On Friday afternoon, members of the Bechtel Assessment team began to review the hard copy documents placed in the Reading Room.

2.	Work Activities Planned This Week (September 14-18)
2.1	<p>General</p> <ul style="list-style-type: none"> Complete badging for Bechtel Assessment team members. Scheduled breakout meetings with WEC and CB&I personnel on Tuesday (September 15), Wednesday (September 16), and Thursday (September 17) from 1-4 pm to discuss: <ul style="list-style-type: none"> Quantity Curves Craft Staffing Curves % Complete Curve Schedule – Critical Paths Quality Issues Modules <p>Follow-up meetings will be schedule as needed.</p>
2.2	<p>Project Management</p> <ul style="list-style-type: none"> Carl Rau and Dick Miller have requested to have singular interviews with the following people on Wednesday, September 16: Steve Byrne, Jeff Archie (in Japan all week), Ron Jones, Alan Torres, Carlette Walker, and Carl Churchman. Continue review of documents in Reading Room.
2.3	<p>Construction</p> <ul style="list-style-type: none"> Perform direct observation of site activities: <ul style="list-style-type: none"> Jobsite and area walk downs with senior construction personnel responsible for work areas.

September 14, 2015
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Bechtel Weekly Report
V.C. Summer Units 2 & 3 Completion Assessment
Week Ending September 11, 2015

	<ul style="list-style-type: none"> - Review of on-site fabrication activities of modules. - Review of indirects with responsible superintendent. - Review of construction equipment with responsible superintendent. - Overview of the safety program including the successes and challenges. - Overview of the Quality Control program and activities. - Overview of the Work Package process and Document Control. - Review of constructability review program with responsible manager. - Attend the following meetings: <ul style="list-style-type: none"> - POD – 9-10 am - Area Schedule Review – Thurs 1-3 pm - Module meeting with Customer – Tues 11-12 pm - OCC & Site laydown plan – Wed 12-1 pm - Safety meeting - Individual Area Schedule Review meetings. • Review documents in reading room. • Conduct internal discussions on comparisons of VCS against Bechtel historical information on unit rates, schedule durations, quantities, manpower, etc. • Review welding activities, quantities, and manpower required.
2.4	<p>Engineering and Licensing</p> <ul style="list-style-type: none"> • Continue review of documents in Reading Room. • Participate in breakout meetings described in Item 2.1. Schedule follow-up meetings as needed. • Attend CB&I/WEC Engineering Issues Meeting (0700). • Meetings are being scheduled with WEC, CB&I, and SCE&G lead engineering personnel. • Followup meeting scheduled with Brian McIntyre, WEC Licensing, at 8 am on Tuesday, September 15. • Meeting with April Rice, SCE&G Licensing, is scheduled for Tuesday, September 15, at 4:30 pm.
2.5	<p>Procurement</p> <ul style="list-style-type: none"> • Continue review of documents in Reading Room. • Meetings are being scheduled with CB&I Procurement at the corporate level, followed by the site team. • Meetings are being scheduled with Westinghouse's Procurement organization. • Attend the following meetings: <ul style="list-style-type: none"> - POD – 9-10 am - Area Schedule Review – Thru 1-3 pm - Module meeting with Customer – Tues 11- 12 pm - OCC & Site laydown plan – Wed 12-1 pm

September 14, 2015
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Bechtel Weekly Report
V.C. Summer Units 2 & 3 Completion Assessment
Week Ending September 11, 2015

	<ul style="list-style-type: none">• Participate in schedule reviews with Bechtel Team.• Module Plan – Determine focus of review and where potentially the Bechtel team needs to go.
2.6	Project Controls <ul style="list-style-type: none">• Continue review of documents in Reading Room.• Participate in breakout meetings described in Item 2.1. Schedule follow-up meetings as needed.• Develop sustained rate comparison evaluation tables against Bechtel historical data.• Begin critical path evaluations.• Begin productivity evaluations against Bechtel historical projects.

September 14, 2015
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Bechtel Weekly Report
V.C. Summer Units 2 & 3 Completion Assessment
Week Ending September 18, 2015

1. Project Management

Activities Performed Last Week (September 14-18)

- Four (of the nine) Bechtel personnel on the assessment team completed in-processing and received their Unit 1 badges. Four others were notified that their training was complete so they could be badged when they were available.
- Carl Rau and Dick Miller completed interviews with Ron Jones (VP-New Nuclear Operations and Owner's Project Director), Alan Torres (General Manager-Nuclear Plant Construction), and Carl Churchman (Consortium Project Director).
- September 17 – Bechtel (Steve Routh and Dick Miller) were invited and attended the Monthly Project Status Meeting.
- September 18 – Attended Consortium POD meeting.

Activities Planned This Week (September 21-25)

- Work with Jason Brown of WEC to identify what remaining document requests will be filled this week. Documents provided after this week may be too late to be considered in the Bechtel assessment.
- Complete Unit 1 badging for remaining Bechtel team members.
- Obtain CB&I badges for Bechtel team members.
- Conduct interviews with Carlette Walker (SCE&G VP - Nuclear Financial Administration), Jeffrey Archie (SVP-SCANA and CNO-SCE&G), and Stephen Byrne (EVP-SCANA and COO-SCE&G & President-Generation).
- Attend various team and Consortium meetings.
- Tour site construction areas.

2. Construction

Activities Performed Last Week (September 14-18)

- Reviewed Reading Room material including contract, quantity and manpower curves, September 9 Consortium presentation package, module drawings, etc.
- September 16 - Met with Bill Wood and JJ White and had a general discussion of project including nonmanual staffing, manual skill level and difficulties recruiting skilled crafts, and laid out plans for our walkdowns and interviews.
- September 14 – Toured laydown with SCE&G.
- September 15 – Attended SCE&G module meeting.
- September 15 – Attended Consortium Engineering overview presentation.
- September 15 – Participated in Consortium Project Controls presentation on quantity curves, manpower, earned percent complete, and critical path.
- September 16, 17, 18 – Attended POD meetings.
- September 16 – Met with Consortium Procurement and discussed procurement issues including laydown and warehouse issues, pipe holds and changes, organization.
- September 16 – Participated in Consortium Quality review of project with Dave Jantosik.
- September 17 – Toured the Unit 2 Nuclear Island and discussed issues with Bob Johnson and Andrew Fleetwood.
- September 17 – Toured the Module Assembly Building operation with Bart Schaffer and staff.
- September 18 – Toured the Turbine Building area with Scotty Holland and discussed issues impacting work.
- September 18 – Met with Indirects Superintendent Terry Bolton and reviewed indirect program.

September 21, 2015

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Bechtel Weekly Report
V.C. Summer Units 2 &3 Completion Assessment
Week Ending September 18, 2015

Activities Planned This Week (September 21-25)

- Review new material as it is posted to the Reading Room.
- Attend Plan of the Day meetings.
- Attend September 21 Safety meeting.
- Discuss welding program with Mark Pietre.
- Attend September 21 meeting with Consortium on modules.
- Attend September 23 meeting with Consortium on QC program, including a detailed review of what the civil QC inspector does when inspecting a slab for concrete placement.
- Review Document Control Program, specifically how drawings are given to craftsmen and revisions tracked in the field.
- Review Work Package Program.
- Review Constructability Program.
- Conduct further review of Unit 2 Nuclear Island.
- Perform detailed review of Unit 2 containment schedule.
- Conduct internal discussions on comparisons of VCS against Bechtel historical information on unit rates, schedule durations, quantities, manpower, etc.

3. Engineering and Licensing

Activities Performed Last Week (September 14-18)

- Reviewed electronic and Reading Room material including engineering and licensing procedures, licensing schedules, contract, September 9 Consortium presentation package, module drawings, etc.
- September 14 – Attended Consortium Licensing overview presentation.
- September 15 – Attended Consortium Engineering overview presentation.
- September 15 – Attended Consortium Project Controls presentation.
- September 15 – Met with April Rice of SCE&G to discuss general licensing issues and processes.
- September 16 – Attended Consortium Procurement presentation.
- September 16 – Participated in Consortium Quality review of project with Dave Jantosik.
- September 16, 17 – Attended POD meetings.
- Participated in internal schedule discussions on comparisons of VCS against Bechtel historical information.

Activities Planned This Week (September 21-25)

- Review new material as it is posted to the Reading Room.
- Attend POD meetings.
- Meet with Brad Stokes and other SCE&G Engineering personnel.
- Attend September 21 meeting with Consortium on modules.
- Attend September 22 meeting with CB&I Engineering.
- Schedule visits to CB&I-Charlotte and WEC-Cranbury.
- Meet with Consortium Engineering personnel to discuss piping re-design effort and electrical support design.
- Obtain and evaluate metrics on E&DCRs and N&Ds.
- Review schedules for LARs and ITAAC closure.
- Provide Engineering and Licensing schedule input to Bechtel Project Controls.

September 21, 2015

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**Bechtel Weekly Report
V.C. Summer Units 2 &3 Completion Assessment
Week Ending September 18, 2015**

4. Procurement

Activities Performed Last Week (September 14-18)

- Reviewed electronic and Reading Room material.
- September 15, 17 – Attended POD meetings.
- September 16 – Participated in Consortium Quality review of project with Dave Jantosik.
- September 16 – Met with Consortium site and corporate Procurement management personnel.
- September 17 – Participated in walkdown of Unit 2 containment and adjacent area.
- September 17 – Attended Area Schedule Review meeting.

Activities Planned This Week (September 21-25)

- Continue review of documents in Reading Room as they are submitted.
- Conduct additional meetings with CB&I Site Procurement to discuss data and process.
- Conduct walkdown of site warehouses and laydown yards.
- Schedule further discussion with WEC Procurement.
- Attend POD meetings.
- Attend September 21 meeting with Consortium on modules.
- Discuss need for site visits to module fabricator(s) and schedule.

5. Project Controls

Activities Performed Last Week (September 14-18)

- Reviewed electronic and Reading Room material.
- Compared current planned construction sustained rates to Bechtel historicals.
- Developed Bechtel version Level 2 schedule with additional detail within the key critical areas.
- Prepared a high level schedule milestone comparisons chart.
- Prepared initial productivity analysis for internal team reviews
- September 15 – Attended Consortium Engineering overview presentation.
- September 15 – Attended Consortium Project Controls presentation.
- September 16 – Attended Consortium Procurement presentation.

Activities Planned This Week (September 21-25)

- Continue review of documents in Reading Room as they are submitted.
- Schedule meetings with meetings with Abney Smith Jr. and Michele Stephens.
- Continue critical path evaluations.
- Start schedule probability assessment within P6 through use of PAR software.
- Review and finalize sustained rate comparison tables.
- Finalize Bechtel version L2 schedule for analysis reference.
- Create first revised schedule duration evaluation which considers current productivity impacts projected into the future.
- Create copy of the P6 Construction file with all hard constraints removed for future variation analysis.

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1. Project Management

Activities Performed Last Week (September 21-25)

- All Bechtel personnel are now badged.
- Carl Rau and Dick Miller conducted interviews with Steve Byrne (COO & SVP), Jeff Archie (CNO & SVP), and Carlette Walker (VP Nuclear Financial Administration).
- Attended various team and Consortium meetings.

Activities Planned This Week (September 28-October 2)

- Work with Jason Brown of WEC to obtain the remaining documents requested.
- Interview Santee Cooper personnel.
- Meet with Bechtel assessment team members to review initial observations and recommendations.
- Attend various team and Consortium meetings.
- Tour site construction areas.
- Prepare sections of Bechtel assessment report.

2. Construction

Activities Performed Last Week (September 21-25)

- Reviewed Reading Room material.
- September 21 – Attended weekly superintendent safety meeting.
- September 21 – Met with Consortium personnel to discuss modules status and issues with deliveries and engineering.
- September 21 – Met with SCE&G Quality Manager to discuss client audits of CB&I quality.
- September 22 – Toured inside containment.
- September 22 – Attended the daily C20 Auxiliary Building and Containment 2 superintendent/field engineer schedule meeting.
- September 23 – Toured the shield building.
- September 23 – Met with CB&I Quality Control Manager to discuss organization and responsibilities.
- September 23 – Met with Consortium personnel to review the containment vessel schedule.
- September 24 – Met with CB&I Strategic Planning and Mechanical/Electrical Work Manager to discuss his group's efforts and review work package approach.
- September 24 – Met with Consortium Civil Work Package and Document Control personnel and reviewed the Annex Building civil work package and document control organization.
- September 24 – Met with Consortium project controls personnel to review the Unit 2 containment vessel schedule.
- September 25 – Attended the videoconference with WEC home office and site engineering personnel.

Activities Planned This Week (September 28-October 2)

- Review new material as it is posted to the Reading Room.
- Attend Plan of the Day meetings.
- Hold meeting with CB&I Electrical superintendent to better understand electrical packages.
- Hold meeting with Consortium Advanced Constructability Personnel to better understand Containment 2 civil work.

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- Hold meeting with Consortium personnel to discuss electrical quantities and electrical support designs.
- Hold meeting with CB&I personnel to understand discipline superintendent roles.
- Attend September 28 follow-up meeting with WEC home office and site engineering personnel.
- Meet with Consortium Strategic Planning personnel to discuss work packages for piping and electrical on September 29.
- Meet with Consortium personnel to discuss startup plan, schedule, component test matrix, etc. on September 30.
- Perform detailed review of containment, auxiliary building, and turbine building schedules.
- Conduct internal discussions on comparisons of VC Summer against Bechtel historical information on unit rates, schedule durations, quantities, manpower, etc.
- Prepare sections of Bechtel assessment report.

3. Engineering and Licensing

Activities Performed Last Week (September 21-25)

- Reviewed new material as it is posted to the Reading Room.
- Attended POD meetings on September 22 and 24.
- September 21 – Attended meeting with Consortium on modules.
- September 22 – Attended meeting with CB&I Engineering.
- September 23 – Attended meeting on with Consortium on Strategic Planning.
- September 24 – Attended meeting on Work Package Development and Document Control.
- September 25 – Held videoconference with WEC Home Office (Cranberry, PA) and site engineering personnel to discuss to-go Engineering and engineering changes.
- Reviewed limited available metrics on E&DCRs and N&Ds.
- Provided Engineering and Licensing schedule input to Bechtel Project Controls.

Activities Planned This Week (September 28-October 2)

- Continue review of documents in Reading Room as they are submitted
- Attend September 29 and October 1 POD meetings (focus is engineering).
- Attend September 28 meeting with WEC Engineering to address to-go work (follow-up to September 25 videoconference).
- Attend September 30 meeting with Brad Stokes and other SCE&G Engineering personnel.
- Hold follow-up meeting with CB&I Engineering.
- Hold follow-up meeting with CB&I Licensing.
- Hold follow-up meeting with SCE&G Licensing.
- Meet with Consortium Engineering personnel to discuss piping re-design effort.
- Meet with Consortium personnel to discuss electrical quantities and electrical support design.
- Obtain and evaluate metrics on E&DCRs and N&Ds.
- Review schedules for LARs and ITAAC closure.
- Review representative ITAAC closure packages.
- Provide Engineering and Licensing schedule input to Bechtel Project Controls.
- Prepare sections of Bechtel assessment report.

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4. Procurement

Activities Performed Last Week (September 21-25)

- Reviewed Reading Room material.
- Conducted meetings with CB&I Site Procurement to discuss data, process, and reports.
- Conducted walkdown of site warehouses and laydown yards.
- September 21 – Attended meeting with Consortium on modules.
- September 25 – Attended videoconference with WEC home office and site engineering.

Activities Planned This Week (September 28-October 2)

- Continue review of documents in Reading Room as they are submitted.
- Conduct meeting with CB&I Charlotte and Site Procurement personnel (Consortium to schedule).
- Attend September 28 follow-up meeting with WEC home office and site engineering personnel.
- Prepare sections of Bechtel assessment report.

5. Project Controls

Activities Performed Last Week (September 21-25)

- Reviewed Reading Room material.
- Completed the projects baseline version Level 2 schedule with additional detail within the key critical areas.
- Created first version of Bechtel revised schedule forecast.
- Created baseline bulk installation curves based upon current Consortium forecast.
- Downloaded and reviewed the engineering/procurement P6 milestones file.
- September 22 – Attended Consortium Containment schedule overview.
- September 24 – Attended Consortium Auxiliary Building and Turbine Building schedule overview.

Activities Planned This Week (September 28-October 2)

- Continue review of documents in Reading Room as they are submitted.
- Create revised Bechtel forecasted critical path for evaluation.
- Create Basis and Assumptions file for Bechtel forecasts.
- Create multiple forecasts based upon productivity analysis.
- Finalize Bechtel version of Level 2 schedule for analysis reference.
- Create revised bulk and manpower curves based upon Bechtel forecasts.
- Create Unit 3 Level 2 schedule.
- Create combined Unit 2 and 3 craft manpower curves.
- Prepare sections of Bechtel assessment report.

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1. Project Management

Activities Performed Last Week (September 28-October 2)

- Continued with Interviews of Owner Personnel.
- Attended various schedule, work planning, and startup meetings with Consortium members.
- Continued data validation of transmitted project documents.
- Prepared observations and recommendations.
- Prepared sections of Bechtel assessment report.

Activities Planned This Week (October 5-9)

- Interview Santee Cooper personnel.
- Meet with Bechtel assessment team members to review initial observations and recommendations.
- Attend various team and Consortium meetings.
- Tour site construction areas.
- Prepare additional observations and recommendations.
- Continue to prepare sections of Bechtel assessment report.

2. Construction

Activities Performed Last Week (September 28-October 2)

- Reviewed Reading Room material.
- September 29 – Met with CB&I Strategic Planning Group to discuss work packaging.
- September 29 – Met with CB&I Electrical Field Superintendent to review extremely dense and complex electrical raceway and hangers in containment.
- September 29 – Met CB&I Advanced Constructability program to understand group responsibilities.
- September 30 – Observed Work Package distribution from the Document Control Center for Unit 2 Nuclear Island at start of shift.
- September 30 and October 1 – Met CB&I Startup personnel to review startup program and area and system turnovers from construction.
- October 1 – Met with CB&I Modules Procurement Manager to review program for module procurement.
- October 1 – Met with CB&I Shield Wall Manager to review erection of shield wall and roof.
- October 1 – Toured Unit 2 containment and auxiliary buildings and Unit 3 condenser assembly area.
- Conducted internal discussions on comparisons of VC Summer against Bechtel historical information on unit rates, schedule durations, quantities, manpower, etc
- Prepared observations and recommendations.
- Prepared sections of Bechtel assessment report.

Activities Planned This Week (October 5-9)

- Review new material as it is posted to the Reading Room.
- Attend Plan of the Day meetings.
- Attend Safety Meeting.
- Meet with CB&I Labor Relations to discuss recruitment and training of crafts.
- Meet with CB&I Welding Engineering to discuss welding program.
- Meet with CB&I Field Engineering to discuss work packaging.
- Conduct internal discussions on comparisons of VC Summer against Bechtel historical information on

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- unit rates, schedule durations, quantities, manpower, etc.
- Prepare additional observations and recommendations.
- Continue to prepare sections of Bechtel assessment report.

3. Engineering and Licensing

Activities Performed Last Week (September 28-October 2)

- Reviewed new material as it is posted to the Reading Room.
- September 28 – Conducted follow-up conference call with WEC Cranberry Engineering.
- September 29 – Attended meeting with CB&I Strategic Planning Group to discuss work packaging.
- September 29 – Attended meeting with CB&I Electrical Field Superintendent.
- September 29 – Attended meeting CB&I Advanced Constructability program.
- September 30 and October 1 – Attended meeting with CB&I Startup personnel to review startup program.
- September 30 – Met with Brad Stokes, SCE&G General Manager, Engineering Services.
- October 1 – Met with Consortium Project Controls to review WEC Engineering schedule.
- Provided Engineering and Licensing schedule input to Bechtel Project Controls.
- Prepared observations and recommendations.
- Prepared sections of Bechtel assessment report.

Activities Planned This Week (October 5-9)

- Continue review of documents in Reading Room as they are submitted.
- Perform follow-up interviews with Consortium and SCE&G personnel as needed.
- Evaluate metrics on E&DCRs and N&Ds.
- Review schedules for LARs and ITAAC closure.
- Review representative ITAAC closure packages.
- Provide Engineering and Licensing schedule input to Bechtel Project Controls.
- Prepare additional observations and recommendations.
- Continue to prepare sections of Bechtel assessment report.

4. Procurement

Activities Performed Last Week (September 28-October 2)

- Reviewed Reading Room material.
- September 29 – Conducted follow-up meetings with CB&I Site Procurement to discuss data and reports on field procurement activity.
- September 2 – Attended meeting with CB&I on work packages.
- September 30 – Attended meeting with CB&I 1X4 Procurement Manager.
- October 1 – Attended meeting with CB&I Modules Procurement Manager.
- Reviewed ROYG Procurement Report.
- October 1 – Met with WEC to discuss ROYG reports and requested different sorts of reports.
- Prepared observations and recommendations.
- Prepared sections of Bechtel assessment report.

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Activities Planned This Week (October 5-9)

- Continue review of documents in Reading Room as they are submitted.
- Continue to analyze the ROYG report, interface with Project Controls on schedule.
- Hold follow-up meetings as required with CB&I & WEC Procurement.
- Prepare additional observations and recommendations.
- Continue to prepare sections of Bechtel assessment report.

5. Project Controls

Activities Performed Last Week (September 28-October 2)

- Reviewed Reading Room material.
- Created revised Bechtel forecasted Unit 2 critical path for evaluation.
- Created bases and assumptions file for Bechtel forecasts.
- Evaluated multiple forecasts based upon productivity analysis.
- Finalized Bechtel version of Level 2 schedule for analysis reference.
- Created revised bulk and manpower curves based upon Bechtel forecasts.
- Created Unit 3 Level 2 schedule.
- Created combined Unit 2 and 3 craft manpower curves.
- Conducted internal review of preliminary schedule package and incorporated comments.
- September 30 – Attended Consortium commodity installation and manpower curves review.
- October 1 – Attended WEC Engineering schedule review.
- Prepared initial observations and recommendations.
- Prepared sections of Bechtel assessment report.

Activities Planned This Week (October 5-9)

- Continue review of documents in Reading Room as they are submitted.
- Update bases and assumptions file for Bechtel forecasts for Unit 3.
- Finalize Bechtel version of Level 2 Unit 3 schedule.
- Analyze Unit 2 and 3 bulk curves for stagger between units.
- Finalize combined Unit 2 and 3 craft manpower curves.
- Continue to prepare sections of Bechtel assessment report.
- Finalize schedule package for internal management review.
- Prepare additional observations and recommendations.
- Continue to prepare sections of Bechtel assessment report.

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Week Ending October 9, 2015

1. Project Management

Activities Performed Last Week (October 5-9)

- October 9 – Met with CB&I Functional Operations Manager in Charlotte.
- Reviewed draft schedule, quantities, and sustained rates developed by Bechtel Project Controls.
- Prepared observations and recommendations.
- Prepared sections of Bechtel assessment report.

Activities Planned This Week (October 12-16)

- Interview Santee Cooper personnel.
- Finalize observations and recommendations.
- Finalize sections of Bechtel assessment report.
- Meet with Bechtel assessment team members to review draft report sections, observations and recommendations.
- Complete preparation of Bechtel draft report.

2. Construction

Activities Performed Last Week (October 5-9)

- Reviewed Reading Room material.
- October 7 – Attended Plan of the Day meeting.
- October 7 – Met with CB&I Lead Welding Engineer to discuss welding program.
- October 7 – Met with CB&I Human Resources Director to discuss non-manual turnover.
- October 7 – Met with CB&I Project Director to review some initial observations of construction effort.
- October 9 – Met with CB&I Industrial Relations Director to discuss recruiting of crafts.
- Conducted internal discussions on comparisons of VC Summer against Bechtel historical information on unit rates, schedule durations, quantities, manpower, etc.
- Prepared observations and recommendations.
- Prepared sections of Bechtel assessment report.

Activities Planned This Week (October 12-16)

- Review new material as it is posted to the Reading Room.
- Attend Plan of the Day meetings.
- Visit Craft Training trailer.
- Meet with CB&I Work Package planning personnel discuss work packaging, expected problems with electrical installations.
- Conduct internal discussions on comparisons of VC Summer against Bechtel historical information on unit rates, schedule durations, quantities, manpower, etc.
- Finalize observations and recommendations.
- Finalize sections of Bechtel assessment report.

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3. Engineering and Licensing

Activities Performed Last Week (October 5-9)

- Reviewed new material as it is posted to the Reading Room.
- Provided Engineering and Licensing schedule input to Bechtel Project Controls.
- Prepared observations and recommendations.
- Prepared sections of Bechtel assessment report.

Activities Planned This Week (October 12-16)

- Continue review of documents in Reading Room as they are submitted.
- Perform follow-up interviews with Consortium and SCE&G personnel as needed.
- Finalize observations and recommendations.
- Finalize sections of Bechtel assessment report.

4. Procurement

Activities Performed Last Week (October 5-9)

- Reviewed Reading Room material.
- October 7 – Conducted follow-up meetings with CB&I Site Procurement to discuss data and reports on field procurement activity.
- Reviewed ROYG Procurement Report.
- October 7, 8, 9 – Met with WEC Deputy Project Manager to discuss ROYG reports and requested different sorts of the ROYG report.
- Prepared observations and recommendations.
- Prepared sections of Bechtel assessment report.

Activities Planned This Week (October 12-16)

- Finalize observations and recommendations.
- Finalize input to Bechtel assessment report.

5. Project Controls

Activities Performed Last Week (October 5-9)

- Reviewed Reading Room material.
- Developed internal schedule package for review.
- Updated bases and assumptions to include Unit 3 addition to Level 2 schedule.
- Finalized Bechtel version of Level 2 schedule for analysis reference including Unit 3 forecasts.
- Conducted internal "Team Meeting" review and incorporated comments into overall schedule package.
- Decided on the separation duration between Unit 2 and 3 completion dates.
- Finalized Units 2 and 3 manpower curves.
- Created Unit 2 percent complete curves based on Bechtel forecast.
- October 9 – Met with CB&I Functional Operations Manager in Charlotte.

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- Created additional Observations and Recommendations.
- Prepared sections of Bechtel assessment report.

Activities Planned This Week (October 12-16)

- Continue to review documents in Reading Room as they are submitted.
- Finalize Bechtel version of Level 2 Unit 3 schedule.
- Finalize observations and recommendations.
- Finalize sections of Bechtel assessment report.

PRIVILEGED MATERIAL

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Bechtel Weekly Report
V.C. Summer Units 2 & 3 Completion Assessment
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1. Project Management

Activities Performed Last Week (October 12-16)

- October 16 – Met with SCE&G CEO.
- Reviewed draft schedule, quantities, and sustained rates developed by Bechtel Project Controls.
- Prepared observations and recommendations.
- Prepared sections of Bechtel assessment report.
- Prepared presentation to SCE&G and Santee Cooper executive management.

Activities Planned This Week (October 19-23)

- October 22 – Presentation to SCE&G and Santee Cooper executive management.
- Finalize observations and recommendations.
- Finalize sections of Bechtel assessment report.

2. Construction

Activities Performed Last Week (October 12-16)

- October 13, 15 – Attended Plan of the Day meeting.
- October 13 – Met with CB&I work planning group to discuss electrical and pipe hanger installation challenges.
- October 13 – Met with CB&I training manager to discuss program and capabilities of the onsite training facility and staff.
- October 14 – Performed field walkdown.
- Conducted internal discussions on comparisons of VC Summer against Bechtel historical information on unit rates, schedule durations, quantities, manpower, etc.
- Prepared observations and recommendations.
- Prepared sections of Bechtel assessment report.
- Prepared input for presentation to SCE&G and Santee Cooper executive management.

Activities Planned This Week (October 19-23)

- Conduct internal discussions on comparisons of VC Summer against Bechtel historical information on unit rates, schedule durations, quantities, manpower, etc.
- Finalize observations and recommendations.
- Finalize sections of Bechtel assessment report.

3. Engineering and Licensing

Activities Performed Last Week (October 12-16)

- October 14 – Performed field walkdown.
- Reviewed new material posted to the Reading Room.
- Prepared observations and recommendations.
- Prepared sections of Bechtel assessment report.
- Prepared input for presentation to SCE&G and Santee Cooper executive management.

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Activities Planned This Week (October 19-23)

- Finalize observations and recommendations.
- Finalize sections of Bechtel assessment report.

4. Procurement

Activities Performed Last Week (October 12-16)

- Prepared observations and recommendations.
- Prepared sections of Bechtel assessment report.
- Prepared input for presentation to SCE&G and Santee Cooper executive management.

Activities Planned This Week (October 19-23)

- Finalize observations and recommendations.
- Finalize input to Bechtel assessment report.

5. Project Controls

Activities Performed Last Week (October 12-16)

- Reviewed Reading Room material.
- Developed internal schedule package for review.
- Prepared observations and recommendations.
- Prepared sections of Bechtel assessment report.
- Prepared input for presentation to SCE&G and Santee Cooper executive management.

Activities Planned This Week (October 19-23)

- Finalize observations and recommendations.
- Finalize sections of Bechtel assessment report.

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